

# **Exhibit A**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
  
PENNYMAC LOAN SERVICES, LLC, )  
Plaintiff, )  
vs. ) No. 2:19-cv-00193-KS-MTP  
SITCOMM ARBITRATION )  
ASSOCIATION, MARK MOFFETT,  
SANDRA GOULETTE, RONNIE )  
KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT, )  
Defendants. )

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REMOTE VIDEO RECORDED DEPOSITION OF SANDRA GOULETTE  
Laurel, Mississippi  
Tuesday, December 8, 2020  
Volume I

Reported by:  
LISA ANDREASEN  
CSR No. 9584  
Job No. 4367213  
PAGES 1 - 86

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KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT, )  
Defendants. )

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Remote video recorded deposition of SANDRA  
GOULETTE, Volume I, taken on behalf of Plaintiff with  
the witness located in Laurel, Mississippi, beginning  
at 10:46 a.m. PST and ending at 3:09 p.m. PST on Tuesday,  
December 8, 2020, before LISA ANDREASEN, Certified  
Shorthand Reporter No. 9584.

1 APPEARANCES:

2  
3 For Plaintiff:

4 BLANK ROME LLP

5 BY: CHERYL S. CHANG, ESQ.

6 2029 Century Park East, 6th Floor

7 Los Angeles, California 90067-2907

8 424.239.3400

9 Chang@blankrome.com

10 (Appearing Remotely)

11  
12 UPSHAW, WILLIAMS, BIGGERS & BECKHAM, LLP

13 BY: HARRIS F. POWERS III, ESQ.

14 309 Fulton Street

15 Post Office Drawer 8230

16 Greenwood, Mississippi 38935-8230

17 662.455.1613

18 Hpowers@upshawwilliams.com

19 (Appearing Remotely)

20  
21 Also Present: Jonathan Manuel, Videographer

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# INDEX

WITNESS EXAMINATION

SANDRA GOULETTE

Volume I

(By Ms. Chang)

6

## EXHIBITS

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|           |                      |    |
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| Exhibit 1 | Notice of Deposition | 11 |
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|           |                               |    |
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| Exhibit 2 | November 17, 2020, letter and | 14 |
|-----------|-------------------------------|----|

attachments to Defendants from

Nicole Metral

|           |                              |    |
|-----------|------------------------------|----|
| Exhibit 3 | December 3, 2020, letter and | 15 |
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attachments to Sandra Goulette

from Nicole B. Metral

|           |                                   |    |
|-----------|-----------------------------------|----|
| Exhibit 4 | Plaintiff PennyMac Loan Services, | 16 |
|-----------|-----------------------------------|----|

LLC'S, Amended Notice of Deposition

of Defendant Sandra Goulette

|           |                                  |    |
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| Exhibit 5 | December 8, 2020, Emails sent to | 82 |
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Sandra Goulette

## INFORMATION REQUESTED

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Laurel, Mississippi, Tuesday, December 8, 2020

10:46 A.M.

THE VIDEOGRAPHER: Good morning. We are  
now going on the record at 10:46 a.m. on Tuesday, 10:46:38  
December 8, 2020. This is the Media Unit 1 of the  
video recorded deposition of Sandra Goulette in the  
matter of PennyMac Loan Services, LLC, versus  
Sitcomm Arbitration Association filed in the United  
States District Court for the Southern District of 10:47:02  
Mississippi, Eastern Division. This is Case Number  
2:19-cv-00193-KS-MTP.

This deposition being is being held via  
Zoom technology. My name is Jonathan Manuel from  
the firm Veritext Legal Solutions, and I'm the 10:47:28  
videographer. The court reporter is Lisa Andreasen  
from firm Veritext Legal Solutions. I am not  
authorized to administer an oath. I'm not related  
to any party in this action nor am I financially  
interested in the outcome. 10:47:41

Counsel and all present in the room and  
everyone attending remotely will now state their  
appearances and their affiliations for the record.  
If there are any objections to proceeding, please  
state them at the time of your appearance beginning 10:47:51

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1 with the noticing attorney.

2 MS. CHANG: Good morning. My name is  
3 Cheryl Chang of Blank Rome, and I am counsel for the  
4 plaintiff in this action, PennyMac Loan Services.

5 MR. POWERS: Hello, this Harris Powers of 10:48:03  
6 the Upshaw Williams law firm in Greenwood,  
7 Mississippi on behalf of the plaintiff, PennyMac  
8 Loan Services, LLC, appearing as local counsel and  
9 noting that I am on Central Time, which is a  
10 two-hour offset from the videographer. 10:48:20

11 THE VIDEOGRAPHER: Would the court reporter  
12 please swear in the witness.

13 SANDRA GOULETTE,  
14 having been administered an oath, was examined and  
15 testified as follows: 10:49:02

16 EXAMINATION

17 BY MS. CHANG:

18 Q Good morning, Ms. Goulette, or good  
19 afternoon where you are in Laurel, Mississippi. My  
20 name, as I mentioned to you earlier today off the 10:49:05  
21 record, is Cheryl Chang, and I represent the  
22 plaintiff in this action, PennyMac Loan Services,  
23 and my co-counsel, Harris Powers, is also on this  
24 Zoom deposition. I will be doing the majority of  
25 the questioning, but if Mr. Powers has any 10:49:23

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1 additional questions, he will be asking you some, as  
2 well. Is there any reason that you will not be able  
3 to answer my questions truthfully and accurately  
4 today?

5 A No. 10:49:35

6 Q All right. One thing that I'm noticing  
7 right off the bat is that you are answering  
8 verbally, which you need to do in order for  
9 Ms. Andreasen to get your answers on the record. If  
10 you shake your head or nod your head, she cannot 10:49:53  
11 record that in the transcript even though there is a  
12 videographer today recording you on video. So  
13 anytime I ask a question, just please provide a  
14 verbal answer such as a yes or a no or, you know,  
15 your explanation of your answer. Don't just nod or 10:50:09  
16 shake your head. Okay?

17 A I understand.

18 Q Are you currently taking any medications  
19 that would affect your testimony today?

20 A No. 10:50:19

21 Q Are you under the influence of alcohol this  
22 morning?

23 A No.

24 Q Any drugs?

25 A No. 10:50:29

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1 Q And are you feeling well enough to testify?

2 A Yes, ma'am.

3 Q You understand that you are under oath

4 today and even though we are not together in a room,

5 as we would normally be doing in a deposition 10:50:44

6 pre-COVID, that you are still under oath and are

7 required to answer questions truthfully?

8 A I understand.

9 Q You understand that I'll ask you questions,

10 and as you answer, the court reporter will be taking 10:51:00

11 down everything we say today.

12 A I understand.

13 Q And if at any point I ask a question or

14 Mr. Powers asks a question that you don't understand

15 or if because of tech difficulties we all have to 10:51:18

16 deal with these days, there's a gap in the sound or

17 the video, please let me know, and I will repeat the

18 question or have the court reporter read it back.

19 A Okay. That's fine.

20 Q So if you answer a question once I ask it, 10:51:34

21 I will assume that you understood the question.

22 Okay?

23 A Yes.

24 Q All right. As we're taking video of this

25 deposition today and we're also having the court 10:51:50

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1 reporter take down the questions and answers, we may  
2 use your testimony at trial in this case or in  
3 another hearing in this case. Do you understand  
4 that?

5 A Yes. 10:52:03

6 Q And you've been very good about this so  
7 far, but when I ask questions, please don't  
8 interrupt my questions. Sometimes I'm mid thought  
9 process in crafting my questions; so just try to  
10 wait before I finish my question and then give your 10:52:21  
11 answer. And you've been doing that perfectly today.  
12 Okay?

13 A Okay.

14 Q And in answering my questions, I don't want  
15 you to ever guess. I want you to give your best 10:52:34  
16 estimate. Do you understand the difference between  
17 a guess and an estimate?

18 A Yes, I do.

19 Q Okay. Great. Now, we'll take a break  
20 every so often to give everyone in this deposition 10:52:47  
21 some comfort to use the rest room or take a break  
22 and walk around. If you need a break at any time  
23 before, you know, I request one or anyone else  
24 requests one, just let me know.

25 A Okay. 10:53:02

1 Q And anytime you request a break, I will  
2 definitely allow you to take a break. Just try not  
3 to ask for break in the middle of a question I'm  
4 asking before you give an answer. Okay?

5 A Yes. 10:53:14

6 Q All right. Since we're on Zoom and we're  
7 not physically together, and Ms. Andreassen did you  
8 ask this off the record, but is there anyone else in  
9 the room that you're in currently?

10 A No. 10:53:28

11 Q And are you testifying from what appears to  
12 be your home office?

13 A Yes.

14 Q Other than what I believe is a laptop with  
15 camera access that you're using right now, what 10:53:42  
16 other electronic devices do you have in the room  
17 with you?

18 A This is not a laptop. This is a desktop.  
19 And as far as another -- another -- other  
20 electronics are concerned, there is a printer, a 10:54:03  
21 camera and a keyboard and a speaker.

22 Q All right. Do you have any cell phones  
23 with you?

24 A Yes.

25 Q How many cell phones do you have with you 10:54:27

1 in the room?

2 A One.

3 Q And can you confirm that you will refrain  
4 from using that cell phone or any of the other  
5 electronic devices other than your computer during 10:54:38  
6 this deposition?

7 A Yes.

8 Q And can you confirm that you will not  
9 communicate with anyone during the deposition by  
10 instant message, Skype, chat, email, texting or any 10:54:52  
11 other method while we're in this deposition?

12 A Correct. I will not do that.

13 Q At any time you do need to take an  
14 important phone call or respond to an urgent text,  
15 just let me know that you need break, and you can do 10:55:10  
16 that off the record, but just do not do that while  
17 we're in session. All right?

18 A Okay.

19 Q All right. I'm going to start by showing  
20 you an exhibit. I'm going to share the screen. So 10:55:22  
21 let me know if this comes up for you.

22 A Okay.

23 (Exhibit 1 was marked for identification.)

24 BY MS. CHANG:

25 Q Can you see it? 10:55:31

1 A Yes.

2 Q All right. This I will represent as  
3 Exhibit 1 is the deposition notice for your  
4 deposition that was sent to you, Ms. Goulette, and  
5 it's PennyMac's notice of deposition of Defendant 10:55:58  
6 Sandra Goulette. And originally this deposition was  
7 set for December 7, 2020, at 11:00 a.m. Central  
8 Time. Did you receive this notice of deposition?

9 A Yes.

10 Q I'll scroll down just so you can see the 10:56:17  
11 rest of it. So let me know if you want me to stop  
12 at any point.

13 All right. So this is a 10-page or an  
14 11-page document that includes the proof of service  
15 and the FedEx delivery confirmation. And I'm 10:57:13  
16 marking this as Exhibit 1 to your deposition. And  
17 you recognize this document. Yes, Ms. Goulette?

18 A Correct.

19 Q Do you recall how you received this notice  
20 of deposition? 10:57:28

21 A I either received it via first-class mail  
22 or Federal Express service.

23 Q What was that last part? You said it was  
24 either by first-class mail or --

25 A Federal Express service. 10:57:50

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1 Q By normal express service?

2 A Federal Express service.

3 Q I'm sorry. Federal Express. My apologies,

4 Ms. Goulette. There is -- there is a little bit

5 of -- I don't know if it's echo or it's just 10:58:05

6 difficult to hear you. So that's why I asked you to

7 repeat the answer, and I apologize about that.

8 All right. So we did send this by Federal

9 Express, and that is why there is a Federal Express

10 confirmation. We sent it to your address in Laurel, 10:58:22

11 Mississippi at 3007 Crescent Hill Drive, and that's

12 on the proof of service to this notice of

13 deposition. Is that your best address to receive

14 mail?

15 A Yes, that's correct. 10:58:37

16 Q And is this the same address you have

17 advised the court in this case to use for you?

18 A Yes, that's correct.

19 Q Is there another address that you are using

20 at this time? 10:58:53

21 A No.

22 Q And this is your home address; is that

23 correct?

24 A Yes.

25 Q And you currently reside there? 10:59:03

1 A I'm sorry.

2 Q You currently reside at this address, 3007  
3 Crescent Hill Drive, Laurel, Mississippi 39440?

4 A Correct.

5 Q All right. We're going to mark as 10:59:18  
6 Exhibit 2 another document that I'll show you.

7 (Exhibit 2 was marked for identification.)

8 BY MS. CHANG:

9 Q This is a November 17, 2020, letter to the  
10 defendants in this current action. Do you recall 10:59:58  
11 receiving this letter?

12 A In regards to the deposition?

13 Q I'm sorry.

14 A Is this also in regards to the deposition?

15 Q Yes. It's a letter that's addressed to all 11:00:28  
16 the defendants in this case. It's regarding the  
17 depositions that we've noticed to date. And so as  
18 you can see on first page of the letter, the  
19 depositions of Mark Johnson, Ronnie Kahapea, Kirk  
20 Gibbs, Sandra Goulette and Mark Moffett are all 11:00:47  
21 listed. Do you recall receiving this letter?

22 A Yes.

23 Q And for the record, I'll note that this is  
24 a 41-page document that identifies the depositions  
25 in the cover letter and then attaches all of the 11:01:05

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1 various deposition notices. Did you also receive  
2 this letter by FedEx?

3 A Correct.

4 Q Okay. I'm going to show you another  
5 document that we'll mark as Exhibit 3. 11:01:23

6 (Exhibit 3 was marked for identification.)

7 BY MS. CHANG:

8 Q This is a December 3rd, 2020, letter that  
9 is addressed by FedEx to you at your Crescent Hill  
10 Drive address, and it is a letter that identifies 11:01:44  
11 your deposition to take place on December 7th at  
12 11:00 a.m., and we provide the Veritext link for the  
13 Zoom meeting. Do you recall receiving this letter,  
14 Ms. Goulette?

15 A Yes. 11:02:00

16 Q And then I believe after you received this  
17 letter you contacted my office on December 4th. Is  
18 that correct?

19 A That was Friday. Yes. Correct.

20 Q I believe you contacted my co-counsel, 11:02:26  
21 Nicole Metral.

22 A Yes.

23 Q And did you ask her to change the date of  
24 the deposition?

25 A Yes, I did. I asked her to either postpone 11:02:41

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1 it to the afternoon of December the 7th or possibly  
2 the following day or as a third alternative to even  
3 maybe switch my time with Mr. Mark Moffett, yes.

4 Q And why did you need to move the deposition  
5 date and time? 11:03:16

6 A Because I had a doctor's appointment this  
7 morning that I needed to get to.

8 Q All right. So we accommodated that. And I  
9 will mark as Exhibit 4 we agreed to set your  
10 deposition for today, and I'll show you that 11:03:32  
11 document right now.

12 (Exhibit 4 was marked for identification.)

13 BY MS. CHANG:

14 Q All right. This is Exhibit 4, which is an  
15 amended notice of deposition for Defendant Sandra 11:03:54  
16 Goulette, and it sets the deposition for  
17 December 8th, 2020, which is today at 12:30 Central  
18 Time, which is 10:30 a.m. Pacific Time. Did you  
19 receive this amended deposition notice,  
20 Ms. Goulette? 11:04:13

21 A I did not receive this; however, I did  
22 receive a telephone call from Attorney Metral that  
23 told me that I would be receiving an email by Monday  
24 morning.

25 Q All right. And did you receive that email? 11:04:31

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1 A Yes.

2 Q And did the email include a Zoom link that  
3 you're now using to access this deposition?

4 A Yes.

5 Q All right. Now, you mentioned you asked 11:04:43  
6 Ms. Metral on December 4th to change the day of the  
7 deposition or to switch or swap with Mr. Mark  
8 Moffett his deposition date, which is set for  
9 tomorrow, December 9th. Have you spoken to  
10 Mr. Moffett about today's deposition in any manner? 11:05:05

11 A No. As a matter of fact, in my email to  
12 Attorney Metral, I asked her that if it was possible  
13 that she reach out to Mr. Moffett and ask him if he  
14 would be willing to make those accommodations.

15 Q And so you haven't spoken to Mr. Moffett 11:05:30  
16 about this deposition?

17 A No, sir -- no, ma'am.

18 Q Have you spoken to Mr. Moffett about his  
19 deposition?

20 A No, ma'am. 11:05:44

21 Q All right. Have you had in your deposition  
22 taken before?

23 A Yes, ma'am.

24 Q And how many times have you had your  
25 deposition taken? 11:05:53

1           A     One time quite a long time ago, actually  
2     over 20 years ago.

3           Q     That is a long time ago. Do you happen to  
4     remember what type of case it was that you testified  
5     in? 11:06:09

6           A     It was -- yes, I do. I was a paralegal for  
7     a home inspection firm in Salem, Massachusetts, and  
8     I was required to give a deposition in that case,  
9     yes.

10          Q     And do you recall what the case was about? 11:06:29  
11     I mean, I understand that you were testifying as a  
12     paralegal at a home inspection firm in  
13     Massachusetts. But was it a personal injury case?  
14     Was it an employment case?

15          A     No, it was actually a case where one of the 11:06:47  
16     home inspectors was allegedly accused of not  
17     conducting a proper home inspection.

18          Q     And the allegations against this home  
19     inspector, is this a person that you worked with at  
20     the law firm, or was it a client of the firm? 11:07:12

21          A     I did not work -- I did not work for a law  
22     firm. I was the paralegal for a home inspection  
23     company.

24          Q     Okay. So did you -- did you work with the  
25     home inspector that was alleged to not have done a 11:07:30

1 proper home inspection?

2 A No. The home inspectors, they worked all  
3 throughout the state of Massachusetts, and so they  
4 did not frequent the office because we only had one  
5 office in a central location. So many of the home 11:07:51  
6 inspectors I had never even met.

7 Q And so you testified as a witness, not a  
8 party to the lawsuit?

9 A I'm having a hard time hearing you.

10 Q All right. Were you a party to the 11:08:10  
11 lawsuit? Meaning were you a plaintiff or defendant  
12 in the case?

13 A No, I was not a party to the lawsuit. No.

14 Q All right. So you were a witness?

15 A Yes. Because I was the paralegal, I was 11:08:24  
16 the person in charge of handling all incoming  
17 requests, and I was also the person in charge of  
18 following through with the clients and finding an  
19 appropriate remedy for the potential purchaser of  
20 the home as well as for the inspector. 11:08:56

21 Q All right. Did you end up testifying in  
22 court for that case, in trial or any other hearing?

23 A No. The case was settled, ma'am.

24 Q All right. Thank you. What have you done  
25 to prepare for today's deposition? 11:09:17

1           A     I have -- not really all that much. I mean  
2     I have gone over some paperwork in regards to the  
3     arbitrations that took place. And aside from that,  
4     I really don't have anything else to go over.

5           Q     All right. And we'll get to the documents     11:09:51  
6     that reviewed -- you said you reviewed about the  
7     arbitration that took place. But did you speak to  
8     anyone about today's deposition?

9           A     No.

10          Q     And let's -- let's talk about the documents     11:10:05  
11     that you said you reviewed in preparation for this  
12     deposition. What documents did you review?

13          A     I believe it was really documents that I  
14     have given you, your -- any kind of correspondence  
15     that was received on behalf of the client. We have     11:10:29  
16     a very strict policy here at the organization  
17     and another -- excuse me -- clients are never  
18     permitted prior to their request to speak with the  
19     arbitrator. Because that would be considered  
20     ex parte communication. So we never let this     11:11:00  
21     happen --

22                THE REPORTER: I'm sorry. I have to  
23     interrupt. I cannot understand the witness. I  
24     don't know if anybody else is having difficulty.

25                MS. CHANG: Yes. So, Sandra, I think --     11:11:14

1 are you on a headset or earpods?

2 THE WITNESS: Yes, because my speaker  
3 doesn't work; so I have to speak through a phone.

4 MS. CHANG: Oh, you have to speak through  
5 the phone. Do you want to try disconnecting the 11:11:29  
6 earpods and just speaking directly into the phone  
7 instead? Can you do that?

8 THE WITNESS: I can try that, yes. Okay.  
9 Is that -- is that better?

10 MS. CHANG: Like a thousand times better. 11:12:32

11 THE WITNESS: Okay. Sorry about that,  
12 ma'am.

13 MS. CHANG: That's all right. You know, it  
14 will cause you a little bit of discomfort, I guess,  
15 holding up the phone for a long time. Do you have 11:12:42  
16 maybe wired earbuds or a headset? Because that  
17 would work better than the earpods.

18 THE WITNESS: These are Bluetooth.

19 MS. CHANG: Oh, they're Bluetooth. I think  
20 that's part of the problem. Because sometimes 11:12:59  
21 Bluetooth has, like, a lot of ambient noise. So  
22 it's like we're listening to you under water or  
23 something. So now we can try having you hold the  
24 phone, but I know that's going to be exhausting for  
25 you. So if it does get tiring, just let us know. 11:13:13

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1 We can take more frequent breaks, or, you know, on a  
2 break, we can try and find another solution. Is  
3 that okay?

4 THE WITNESS: That's fine. Yes. Thank  
5 you. 11:13:25

6 MS. CHANG: Okay. Thank you.

7 BY MS. CHANG:

8 Q Because I know Ms. Andreasen and I were  
9 both having difficulty hearing you, let's start at  
10 the beginning. What documents did you review? You 11:13:35  
11 mentioned that they were correspondences with the  
12 client. Let's just start from the beginning on the  
13 documents that you reviewed in preparation for the  
14 deposition.

15 A So the only documents that I, you know, go 11:13:46  
16 over are the documents that clients submit to the  
17 organization, and then I -- I hand those kind of  
18 documents over to an arbitrator. If an arbitrator  
19 has any kind of conflict of interest or feels that  
20 the arbitrator is not able to handle that dispute 11:14:28  
21 for whatever reason, then it would be reassigned.  
22 So basically I just make sure that the application  
23 is filled out, all the documentation is received,  
24 and that's pretty much it.

25 Q Okay. So that was an overview of what you 11:15:06

1 do at Sitcomm, it sounds like. But do you recall  
2 what specific documents you reviewed in preparation  
3 for this deposition?

4 A Well, each -- each client who applies for  
5 arbitration, they're required to fill out an 11:15:27  
6 application. And those are typically the documents  
7 that -- that I review along with making sure -- I  
8 mean, before we can move forward with arbitration,  
9 we have to make sure that -- that we have a copy of  
10 their -- of their contractual agreement. Okay. We 11:15:54  
11 have to make sure that they have filled out the  
12 application and that they have paid the appropriate  
13 fees. And so basically, you know, those are the  
14 things that I look for before I pass those cases on  
15 to an arbitrator. 11:16:30

16 Q Okay. So in preparation for today's  
17 deposition, which clients' applications did you look  
18 at?

19 A In preparation for today's application?

20 Q In preparation for today's deposition. 11:16:46  
21 Because you mentioned that you look typically at  
22 applications that clients submit in order to have an  
23 arbitration, and you look at the contractual  
24 agreement that they have in order to see if they can  
25 do an arbitration. Which clients' applications did 11:17:07



1 you look at in preparation for today's deposition?

2 A That would be Mr. Mark Johnson and  
3 Mr. Ronnie Kahapea.

4 Q Okay. Anyone else? Any other clients'  
5 applications that you looked for in preparation for 11:17:34  
6 today's deposition?

7 A No.

8 Q Now, as to Mark Johnson, when you looked at  
9 his application, did you find a contract that  
10 allowed him to conduct an arbitration? 11:17:49

11 A So as far as the arbitrations are concerned  
12 and any kind of contractual issue that may have gone  
13 on between the clients, I'll say it this way,  
14 between the claimants and the respondents, okay, it  
15 is absolutely not in my -- I'm not the arbitrator of 11:18:25  
16 the issue. Okay? So it is absolutely -- the  
17 determination is never left up to me to make that  
18 determination. That determination and once that is  
19 signed to an arbitrator, that arbitrator is,  
20 therefore, responsible, okay, for going through all 11:18:51  
21 of the documentation and specifically finding out if  
22 there is a valid arbitration clause and then -- and  
23 then settling the dispute from there.

24 It is not in my position to go through  
25 individual contracts to find out if people are 11:19:19

1 coming forward in a, you know, quote, unquote, good  
2 faith manner. That is something that is completely  
3 left up to the arbitrator to decide.

4 Q Okay. And thank you for that  
5 clarification. So when you looked at Mr. Johnson's 11:19:41  
6 application specifically in preparation for today's  
7 deposition, what did you -- what did you see?

8 A I saw that he met the preliminary  
9 requirements, okay, to have an arbitration hearing  
10 heard, which was he submitted a contract, he paid 11:20:08  
11 his fee, and he provided proof of notice of  
12 informing PennyMac. And so those types of things  
13 that are requirements of our organization  
14 specifically, you know, that would give me the  
15 go-ahead to assign that to an arbitrator. 11:20:51

16 As far as whatever is in the contract, you  
17 know, I don't sit down and read the contract. I'm  
18 not the arbitrator. I can't settle those disputes,  
19 and so that is primarily left up to the individual  
20 who is assigned as a subcontractor to hear that 11:21:15  
21 matter.

22 Q Okay. So is there any other requirement  
23 that you need in these applications in order to send  
24 this to an arbitrator for review? So you said  
25 contract, fees and proof of notice to the 11:21:35

1       respondent. Is there any other part of the  
2       application that you have to look at in order for  
3       the preliminary items to fulfill the necessary  
4       requirements in order for you to pass -- pass it  
5       along to the arbitrator? 11:21:51

6       A     Yes, absolutely. The client has to fill  
7       out what's called a request for dispute resolution  
8       upon complaint. Okay? And that is something else  
9       that I -- that I do take a look of. You know, when  
10      I'm scrolling through it, you know, I particularly 11:22:19  
11      make -- I particularly, excuse me, make sure that  
12      the parties are the same as they are in the  
13      contract. Okay. Those -- you know, those are --  
14      those are basically, you know, my duties. If they  
15      were not, you know -- and so I'll give you an 11:22:45  
16      example. If a claimant was Mark Johnson versus, you  
17      know, GMAC Mortgage and yet he had filled out an  
18      application for Mark Johnson versus PennyMac, that  
19      would -- the whole entire scenario would have been  
20      returned back to Mr. Johnson. 11:23:12

21      Q     Okay. Thank you. That's helpful. So you  
22      did find in your review of Mark Johnson's  
23      application in preparation for this deposition a  
24      contract between Mark Johnson and PennyMac?

25      A     Correct. 11:23:32

1 Q And do you recall what the name of that  
2 contract was?

3 A I -- I -- I -- I wouldn't want to say  
4 because I -- I am not 100 percent, excuse me,  
5 certain. So I wouldn't want to give you, you know, 11:24:04  
6 any kind of inclination that -- that I -- that I  
7 knew because I'm not -- I'm not sure. That's all.

8 Q Right. Like I said at the beginning of the  
9 deposition, I do not want you to guess. But after  
10 the deposition, and I forgot to tell you this, but 11:24:21  
11 Ms. Andreasen is going to create a transcript of  
12 everything that's been said in this deposition, so  
13 every question that I or Mr. Powers asks and every  
14 answer that you give. If I leave or have  
15 Ms. Andreasen leave a blank next to this question 11:24:39  
16 about the title of the contract that you found  
17 between Mark Johnson and PennyMac in his  
18 application, can you fill it in once you get a copy  
19 of the transcript, which will be sent to you for  
20 review and execution? 11:24:58

21 A If I recall correctly, and I may not, I may  
22 not be a hundred percent accurate, the Mr. Johnson  
23 arbitration hearing may have taken place last summer  
24 or in the summer of 2019.

25 Q Okay. 11:25:24

1           A     And so, therefore, I can honestly admit  
2     that, yeah, I'm having a little bit of a difficult  
3     time remembering, you know, the specifics of that at  
4     all.

5           Q     Okay. But in preparation for today,                   11:25:54  
6     meaning today's deposition, you did look at Mark  
7     Johnson's application to Sitcomm for an arbitration  
8     hearing?

9           A     Yes. It's very standard for me to, you  
10    know, for me to make sure that those four key                   11:26:11  
11    elements, okay, are present prior to even assigning  
12    it to an arbitrator. If one of those elements are  
13    even remotely missing or questionable, I should say  
14    that, I absolutely have to return those documents to  
15    the client and inform them that we are unable to               11:26:41  
16    move forward.

17          Q     In Mark Johnson's case, though, he had  
18    those four elements in his application?

19          A     He did have the application, yes. He did  
20    have the contract. He did have the request for               11:26:56  
21    dispute resolution, and he did have his proof of  
22    payment, yes. Correct.

23          Q     And he also had the proof of notice to  
24    PennyMac?

25          A     Yes. He said -- yes. He sent us the proof       11:27:11

1 that he had mailed the notice to PennyMac, yes.

2 Q All right. And when did you do this review  
3 of Mark Johnson's application in preparation for  
4 today's deposition?

5 A When did I do the review of it? 11:27:35

6 Q To prepare for today's deposition.

7 A Probably a couple weeks ago.

8 Q Okay.

9 A I've had -- I've had a couple of pretty  
10 serious things going on the past couple weeks that I 11:27:54  
11 had to take care of. So I have not been able to  
12 look at it since.

13 Q I understand. Do you recall when you  
14 looked at this file, Mark Johnson's file, a couple  
15 weeks ago if you saw the contract? 11:28:17

16 A If I saw the contract?

17 Q Yes.

18 A Yes.

19 Q Okay. And you don't recall as you sit here  
20 today what the name of the contract is. Is that 11:28:32  
21 correct?

22 A I don't. It's been about a year; so I'm  
23 not -- you know, I wouldn't want to commit myself to  
24 saying what's the name or the specific name of the  
25 contract was. 11:28:52

1 Q Okay. But when you reviewed the  
2 application for Mark Johnson a couple weeks ago,  
3 were you doing that in a paper hard copy file, or  
4 were you doing that on a computer screen?

5 A On a computer screen. 11:29:05

6 Q Okay. So if I were to ask you to look up  
7 that file on the computer screen again, you would be  
8 able to find it; correct?

9 A Correct.

10 Q All right. So what I'm asking you is that, 11:29:17  
11 I'm going to have Ms. Andreasen put a blank next to  
12 the question about the name of the contract in the  
13 transcript of today's proceedings. After today's  
14 deposition ends, I would like you to look up the  
15 contract and then write in the name of the contract 11:29:38  
16 in the transcript when you get it. Is that okay?

17 A Sure.

18 INFORMATION REQUESTED: \_\_\_\_\_  
19 \_\_\_\_\_

20 BY MS. CHANG: 11:29:46

21 Q Okay. That's great. And when you do get  
22 the transcript after the deposition ends, and it  
23 will be, you know, a couple weeks before it gets to  
24 you, you'll have the opportunity to review all the  
25 questions and answers. And if there are any answers 11:29:58

1 that you believe are inaccurate, like the spelling  
2 of a name or a number, you have every right to go in  
3 and make changes. And once you are comfortable that  
4 everything in the transcript is accurate, you're  
5 going to execute the transcript and return it to our 11:30:18  
6 office or Mr. Powers' office. Is that okay?

7 A Yes, ma'am.

8 Q Okay. So you mentioned that there was a  
9 fee paid by Mark Johnson. How much was that fee?

10 A The fee is for -- for our services depends. 11:30:35  
11 So if there's -- if there's one respondent, anywhere  
12 from one to five respondents, the fee would be \$500.  
13 Okay. So anything from six to ten respondents, you  
14 know, it gradually goes up. To my best  
15 recollection, I do not believe that Mr. Johnson had 11:31:21  
16 more than five respondents.

17 Q I'm sorry. Your recollection is that he  
18 paid more than \$500 for a fee?

19 A No. My recollection would be that he paid  
20 less. He paid \$500, which was the standard for five 11:31:44  
21 respondents but --

22 Q Okay.

23 A -- again that -- huh?

24 Q So he had one to five respondents in his  
25 arbitration is what you recall? 11:31:59



1           A     That is what I recall, yes. But, again, I  
2     was not the arbitrator on that matter. So, you  
3     know, I wouldn't be able to give you a hundred  
4     percent specifics on that, no.

5           Q     Okay. And you said that there's four parts     11:32:17  
6     that are required for this application, and it's the  
7     contract, the fee, the proof of notice, all of which  
8     Mr. Johnson had, and also a request for dispute  
9     resolution upon complaint. What is in the request  
10    for dispute resolution upon complaint? Can you     11:32:41  
11    describe that document for us?

12          A     Sure. The document basically lists the  
13    parties, and it lists what the parties have done as  
14    far as primarily the claimant getting in touch with  
15    the respondent to potentially resolve the dispute.     11:33:04  
16    And if the respondent fails to comply or respond, I  
17    should say, not comply, there's an arbitration  
18    clause in there that specifically gives the claimant  
19    the opportunity to file for arbitration.

20          Q     All right. Now, you mentioned that you     11:33:37  
21    looked at one other application in preparation for  
22    this deposition, and that was Ronnie Kahapea's  
23    application. What did you find in Ronnie Kahapea's  
24    application, if you can remember?

25          A     All of the applications that we receive at     11:33:56

1 SAA, okay, they have to meet those four specific  
2 elements in order to be even referred to an  
3 arbitrator. So Mr. Kahapea, again he had to have  
4 had a contract, okay, proof of his payment, request  
5 for dispute resolution and an application. 11:34:30

6 Q Okay. And also a proof of notice to the  
7 respondent; right?

8 A Correct.

9 Q Okay. And just so it's easier for the  
10 court reporter, Ronnie Kahapea is R-o-n-n-i-e, 11:34:53  
11 Kahapea, K-a-h-a-p-e-a. Now, also for the court  
12 reporter, when you refer to SAA, that's S, as in  
13 Sam, A as in apple, A as in apple, are you referring  
14 to Sitcomm Arbitration Association?

15 A Correct. 11:35:16

16 Q And so if we use SAA or Sitcomm in this  
17 deposition, you'll understand that we're all  
18 referring to Sitcomm Arbitration Association?

19 A Correct.

20 Q All right. Thank you. Now, the same 11:35:29  
21 questions for Mr. Kahapea's application. Do you  
22 recall the name of the contract that you found in  
23 his application?

24 A In Mr. Kahapea's application?

25 Q Yes. 11:35:45

1           A     I don't recall the specific name of the  
2     contract. I believe that Mr. Kahapea is located in  
3     Hawaii.

4           Q     Okay. Were you able to confirm that the  
5     contract was between Mr. Kahapea and PennyMac?           11:36:16

6           A     I'm not sure. To be honest with you,  
7     that's not part of my -- when I'm taking in  
8     arbitrations, okay, an individual could have a  
9     conflict against Sears Roebuck & Company. Right?  
10    They could have a conflict against JC Penney. As           11:36:51  
11    long as they present us with a contract and proof of  
12    service and -- and proof of their payment and the  
13    request for a dispute resolution -- right? -- then I  
14    can go ahead and refer that to an arbitrator. The  
15    arbitrator will then issue a hearing notification to       11:37:18  
16    both of the parties.

17                So in every single instance I couldn't  
18    possibly tell you who -- who had a situation with  
19    another party that they wanted a dispute resolved.  
20    That would be impossible for me to remember all of       11:37:43  
21    those scenarios. So my basic thing is to make sure  
22    that everybody has all the documentation that is  
23    required to move forward, and then it's completely  
24    left up to the arbitrator to solve that dispute.

25           Q     Okay. Well, let me -- let me get some       11:38:11

1 clarification because maybe I misunderstood you.  
2 But when we were talking about Mr. Johnson's file,  
3 you had said that part of your job on behalf of  
4 Sitcomm is that you have to find, you know, these  
5 four prerequisites before this file can be passed on 11:38:34  
6 to an arbitrator. And one of the things that you do  
7 check is that the contract that the client provides  
8 is actually between the client and the respondent.  
9 So if Mr. Johnson had provided -- and this is the  
10 example, I believe, you used, but please correct me 11:38:55  
11 if I'm wrong. If Mr. Johnson had provided you a  
12 contract with GMAC but he wanted to file an  
13 arbitration against PennyMac, you would return the  
14 file to Mr. Johnson. Is that accurate?

15 A You're asking me that if Mr. Johnson had 11:39:13  
16 a -- had a claim against GMAC and he also wanted to  
17 bring in PennyMac, it would be upon me to return  
18 that?

19 Q More that, you know, if Mr. Johnson had an  
20 application to bring a lawsuit or an arbitration 11:39:40  
21 against PennyMac but the contract that he provided  
22 you was not with PennyMac but instead with GMAC that  
23 you would return the file to him. Is that what you  
24 would do?

25 A Of course, yeah. 11:39:53

1 Q Okay. So I'm just trying to get  
2 clarification. Because here with Mr. Kahapea's  
3 file, you used the example that, you know, it's not  
4 your job to decide whether or not the contract is  
5 between the right parties, that that's left up to 11:40:14  
6 the arbitrator. So I'm just trying to understand.  
7 Is it your job as a gatekeeper to confirm that the  
8 contract is between the client and the respondents  
9 that they want to sue, or is that the arbitrator's  
10 job? 11:40:31

11 A Excuse me. Nine times out of ten, you  
12 know, the contractual issue between two parties is  
13 completely at the resolve of the arbitrator. Okay?  
14 It would have absolutely nothing to do with me  
15 because I'm not the arbitrator listening to the 11:40:57  
16 matter. And so what you're asking me, it could play  
17 several different variables. Because, you know,  
18 if -- if Mr. Brown, you know, would like to sue or  
19 has a dispute, I should say, with a homeowner who he  
20 found out has recently disclosed some information -- 11:41:32  
21 right? -- on a brand-new -- a supposed brand-new  
22 air conditioning unit that has been brought in --  
23 okay? -- Mr. Brown may have a case or some something  
24 that he would want to be remedied between those two  
25 parties, but that is not up to me to decide. That 11:42:00

1 is up to the arbitrator to decide.

2 Q Okay. So for Mr. Kahapea's file, you did  
3 not review the contract to make sure that it was  
4 between Mr. Kahapea and PennyMac?

5 A I would have to go back and look again 11:42:22  
6 because that was over a year ago. And off the top  
7 of my head, I don't specifically remember  
8 Mr. Kahapea having anything to do with PennyMac, but  
9 I'm not sure.

10 Q So I understand that you recall 11:42:51  
11 Mr. Kahapea's arbitration being about over a year  
12 ago. In preparation for today's deposition, when  
13 did you last review his application? Was it a  
14 couple weeks ago, the same time that you reviewed  
15 Mr. Johnson's file, or was it at a different time? 11:43:17

16 A No, it was actually later than that because  
17 I had received some kind of documentation, and I  
18 don't know where it is right now, that Mr. Kahapea  
19 had taken his situation or his matter to the United  
20 States District Court in Hawaii. So I was not sure, 11:43:56  
21 you know, the surrounding or what was going on with  
22 that, and so I -- excuse me -- specifically I don't  
23 believe so.

24 And, again, all of this stuff, you know, we  
25 rely on people to bring forth, you know, quote 11:44:23

1 unquote, you know, a good faith effort. Okay? In  
2 other words, if frivolous things come along, such as  
3 a hypothetical, you know, we're going to sue the  
4 wrong bank because they reassumed our mortgage, you  
5 know, that happens all the time, we rely on people 11:45:02  
6 to bring forth what's called a good faith effort.  
7 And if they're not going to do that, then they will  
8 never prevail. And so it's not necessarily my job  
9 to go through, you know, contract after contract  
10 after contract. Because then I would be impeding 11:45:28  
11 the arbitration hearing, okay, and I would also be  
12 giving clues and inclinations towards the arbitrator  
13 that may or may not put him one way or the other.  
14 So I can't do that. It's up to the arbitrator to  
15 decide whether the contract is valid and whether the 11:45:58  
16 parties appeared and made an attempt to appear and  
17 wanted to appear, and it's up to the parties to --  
18 you know, to provide all of their evidence. They're  
19 given ample opportunity to do so, and it's -- you  
20 know, that is how the arbitrator bases their 11:46:29  
21 determination, and it has absolutely nothing to do  
22 with me.

23 Q Okay. Thank you for clarifying that. In  
24 addition to Mr. Kahapea's application, which you  
25 reviewed more recently than you reviewed 11:46:49

1 Mr. Johnson's application, but let's just say they  
2 both happened within the last few weeks, did you  
3 review any other documents in preparation for  
4 today's deposition?

5 A Did I review any documents for today's 11:47:03  
6 deposition? Is that what you said?

7 Q Yes, other than Mr. Johnson's application  
8 and Mr. Kahapea's application.

9 A Yeah. As a matter of fact, I reviewed --  
10 let's see -- the documentation that was sent to me 11:47:29  
11 from Blank & Rome in regards to the deposition, yes.  
12 So, yes, I did go over these documents.

13 Q And those were the notices of deposition  
14 that I showed to you in exhibits 1 through 4 at the  
15 beginning of the deposition? 11:48:01

16 A Correct. Except for in this document,  
17 it -- you know, it has space for all of the  
18 defendants involved. Okay? So yours -- you know, I  
19 think you just showed me my part in this part.  
20 Yeah, so this shows everybody involved. 11:48:27

21 Q Okay. So I'll represent to you that the  
22 document that we marked as Exhibit 2 earlier today  
23 has all of the deposition notices for the various  
24 parties and defendants in this case. I didn't  
25 scroll through the entire document, the 41-page 11:48:43



1 document, but I believe that that's --

2 A I understand.

3 Q Okay. All right. So other than those

4 notices of deposition, Mr. Kahapea's file and

5 Mr. Johnson's file, did you review any other 11:48:58

6 documents in preparation for today?

7 A Off the top of my head, no, Ms. Attorney

8 Chang. And the reason is I have been ill for the

9 past couple weeks. I had a doctor's appointment

10 yesterday morning for a severe infection, which I'm 11:49:32

11 now on heavy antibiotics for. So I've been down and

12 out in bed a lot, and, you know, this is -- it's

13 kind of been piling up. I'm just now starting to

14 feel better, thank God, and I have all intentions

15 on, you know, getting -- getting back to this rather 11:50:01

16 quickly. But I just haven't -- I ended up getting a

17 pretty bad infection, needed some IV treatment, as

18 well as antibiotics so -- but I will be pursuing

19 that relatively soon.

20 Q All right. And I'm sorry to hear about 11:50:34

21 your infection, but I'm glad that you are feeling

22 better, that you were able to see the doctor.

23 A Thank you.

24 Q Other than the antibiotics that you're on

25 right now, are you on any other medications today? 11:50:46

1 A No, ma'am.

2 Q Okay. And with regard to these documents  
3 that you reviewed, could you please produce them to  
4 my office or email them to Ms. Metral?

5 A Um-hmm. 11:51:04

6 Q Okay. I'd ask --

7 A I --

8 Q Go ahead.

9 A So you would like a copy of the Johnson  
10 contract? 11:51:12

11 Q I would like --

12 A A lot these prep --

13 Q Yes, the entire application for those  
14 parties, not just the contract. So anything that  
15 you would have reviewed in preparation for this 11:51:23  
16 deposition I would like you to send that to  
17 Ms. Metral, if you could, after the deposition.

18 A Okay. Yes. So our -- excuse me. Our  
19 subcontractors, you know, our arbitrators are hired  
20 as -- strictly as subcontractors, and they are 11:51:47  
21 responsible for notifying parties. They're  
22 responsible for going through all documentation and  
23 evidence including any of these matters. They're  
24 also responsible for -- for getting any paperwork to  
25 include any type of award, if one is merited, to 11:52:18

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1 both of the parties. And so, you know, it's a  
2 matter of them following through with and being  
3 responsible and doing what they're supposed to do,  
4 and I'm just kind of like somewhat the overseer of  
5 that. You know, if I get an email that a document 11:52:50  
6 hasn't been received, then I take care of it  
7 immediately. You know, that's -- I have nothing to  
8 do with the hearings or anything of that nature.

9 Q Okay. Well, let's get into your role at  
10 Sitcomm. Because I think that's kind of what you're 11:53:10  
11 talking about right now. When did you first  
12 become -- become involved with Sitcomm Arbitration  
13 Association?

14 A I became involved with Sitcomm in January  
15 of 2019. 11:53:31

16 Q And how did you become involved with  
17 Sitcomm?

18 A I was informed by a friend of a friend that  
19 they were looking for arbitrators. Now, at that  
20 time, there was a different director, which was not 11:53:58  
21 a good situation. So he after quite a few months, I  
22 think by June of that year of 2019, he had left.  
23 And unfortunately the founder of the organization  
24 was predisposed and unable to get back into the  
25 scene to -- to do anything about it, you know. And 11:54:49

1 so, I guess, because of my -- my background and my  
2 degrees, I was just asked to, you know, just do kind  
3 of like an oversee type of thing and make sure that  
4 everybody was doing the right thing and not -- you  
5 know, and not making absurd, you know, decisions and 11:55:26  
6 whatnot.

7 I'm in the process of going back to law  
8 school, and, you know, I made it very clear from the  
9 beginning that I would be doing this temporarily  
10 just to -- you know, just to help really. I would 11:55:58  
11 imagine that the founder of the organization will be  
12 back within -- or I should say by the end of this  
13 month.

14 Q And who is that founder?

15 A That is Brett Jones, J-o-n-e-s. 11:56:30

16 Q Is Brett Jones known by any other names?

17 A Legally, no. Nickname-wise, yes.

18 Q Okay. What are his -- what are his  
19 nicknames?

20 A That would be Eeon, E-e-o-n. 11:57:00

21 Q Any other nicknames?

22 A Nickname?

23 Q Correct.

24 A I -- nickname, I don't know, but prior  
25 to -- prior to -- prior to Brett Jones his name was 11:57:34

1 Branch, Keefe Branch.

2 Q And is that Branch like a tree branch,  
3 B-r-a-n-c-h?

4 A Yes, ma'am.

5 Q So his name was -- and was that -- was 11:57:57  
6 Keefe Branch a prior legal name for Brett Jones?

7 A Yes, ma'am.

8 Q Okay. Any other legal names that he has  
9 gone by, if you know?

10 A Not to my knowledge, ma'am. 11:58:12

11 Q All right. So going back to January 2019  
12 when you first became involved with Sitcomm, you  
13 said that a friend of a friend referred you. Do you  
14 recall the names of those two friends?

15 A Well, excuse me. What was happening at the 11:58:33  
16 time was that Brett was making Eeon videos on  
17 YouTube. Okay? And a -- what do you call it? A  
18 friend of a -- a friend of a -- a friend of a  
19 friend, you know, like an acquaintance of ours is  
20 what I should say, had gone through something 11:59:12  
21 similar in a situation. However, his -- his  
22 situation prevailed.

23 Q And by his situation, do you mean  
24 arbitration, or do you mean something else? I'm not  
25 clear on what you're -- 11:59:39

1 A Arbitration.

2 Q Okay. Do you recall the friend that  
3 referred you to Sitcomm? Do you recall the name of  
4 the friend?

5 A That referred me to Sitcomm? 11:59:51

6 Q Yes.

7 A I think it was -- I think her name was  
8 Sheryl Taraquta.

9 Q Can you spell the last name for us.

10 A T-a-r-a, Tara -- q-u-t-a. 12:00:10

11 Q And is that a Sheryl with an "S" or a  
12 Sheryl with a "C"?

13 A An "S".

14 Q All right. So Sheryl Taraquta referred you  
15 to Brett Jones or to someone else at Sitcomm? 12:00:31

16 A She didn't refer me to Brett Jones. She  
17 referred me to Eeon.

18 Q And Eeon is the nickname for Brett  
19 Jones; is that correct?

20 A Eeon is the name that he is attempting to 12:00:46  
21 change his legal name of Brett John -- Brett Jones  
22 to, yeah.

23 Q Okay. Now, when Sheryl Taraquta referred  
24 you to Eeon, did you meet him in person, or was  
25 there a telephone call or email exchange? How did 12:01:14

1 you first meet Eeon?

2 A I've never met Eeon in person.

3 Q When --

4 A He lives in California, and I live in

5 Mississippi. 12:01:26

6 Q Okay. So this friend, Sheryl Taraquta,  
7 does she live in Mississippi or California or  
8 somewhere else?

9 A She lives in Michigan.

10 Q Michigan? Where in Michigan? 12:01:40

11 A She owned a house in Saint Clair, but I  
12 think she lost it a couple years ago. So really I  
13 haven't talked to her. Sheryl has gotten in trouble  
14 for having an extremely large amount of animals in  
15 her house, and they took all the animals away, and 12:02:11  
16 she kind of went -- she wasn't happy. And I haven't  
17 talked to her since. But the Eeon videos on YouTube  
18 have been along for a long time.

19 Q Did Sheryl Taraquta hire Sitcomm to file an  
20 arbitration on her behalf? 12:02:47

21 A Not that I know of, no.

22 Q When Sheryl Taraquta referred you to Eeon,  
23 did she say how she knew Eeon?

24 A I think just through his videos, yes.

25 Q All right. And you mentioned that Eeon, 12:03:01

1 a.k.a. Brett Jones, was predisposed at one point.

2 What did you mean by that?

3 A He's currently in -- he's currently located  
4 in the California Department of Corrections and  
5 Rehabilitation. 12:03:26

6 Q So he's currently incarcerated?

7 A Yes, ma'am.

8 Q Do you know what crime or crimes he was  
9 convicted of to result in his current incarceration?

10 A Yes. In 1998 he was accused in Arizona of 12:03:42  
11 something with a minor. I'm sorry. I don't know  
12 all these criminal terms but something with a minor.  
13 And then right after that, SORNA was enacted. Okay?

14 And although his conviction was -- was pre-SORNA,  
15 they put him on SORNA anyway. And so consequently 12:04:32  
16 after that he went to jail in New Mexico. He went  
17 to jail in Puerto Rico, and then in California  
18 they've had him in jail now for a year and a half.

19 And it wasn't until just last week the California  
20 appellate judge reversed his decision because the 12:05:05  
21 superior court judge didn't have the appropriate  
22 amount of evidence to give him the sentence that he  
23 was supposed to get, and that's why he is supposed  
24 to be out at the end of this month, December 28th to  
25 be exact. 12:05:34

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1 Q All right. And you mentioned SORNA. Is  
2 that an acronym? I'm not familiar with it. What  
3 did you mean by SORNA?

4 A SORNA is the federal -- federal act for  
5 people who have been convicted of sexual abuse 12:06:05  
6 crimes, and they have to register. That's what  
7 SORNA is.

8 Q Can you spell SORNA for us.

9 A S-O-R-N-A.

10 Q And you said that Eeon is getting released 12:06:38  
11 December 28th?

12 A Yes, ma'am.

13 Q And how did you obtain this information  
14 about Eeon's status at the appellate court?

15 A It's online. 12:07:00

16 Q And did you obtain that information by  
17 looking it up online yourself?

18 A Correct.

19 Q Have you been in contact with Eeon while  
20 he's been incarcerated? 12:07:15

21 A Yes, ma'am.

22 Q And how do you communicate with Eeon? By  
23 telephone? By email? By in-person visitation?

24 A No, he calls me. He doesn't have access to  
25 computers. 12:07:35

1 MS. CHANG: All right. Why don't we take a  
2 15-minute break. It's been a little over an hour, I  
3 believe.

4 THE WITNESS: Thank you.

5 THE VIDEOGRAPHER: We're now going off the 12:07:51  
6 record. The time is 12:07 p.m. PST.

7 MS. CHANG: All right. Thank you. So  
8 we'll come back on at 12:22.

9 (Recess taken.)

10 THE VIDEOGRAPHER: We're now going back on 12:36:50  
11 the record. The time is 12:36 p.m. Pacific Standard  
12 Time.

13 MR. POWERS: Ms. Chang, let the record  
14 reflect that this is Harris Powers, local counsel,  
15 still on the record. 12:36:59

16 MS. CHANG: Thank you, Mr. Powers.

17 BY MS. CHANG:

18 Q All right. Ms. Goulette, before we took a  
19 break, you were talking about Eeon or Mr. Brett  
20 Jones and the appellate decision that reversed his 12:37:14  
21 conviction, and you testified that he was going to  
22 be released from prison on December 28th. And you  
23 mentioned that you do speak to him over the phone  
24 while he's in prison because he doesn't have  
25 computer access. How often do you speak to 12:37:36

1 Mr. Jones on the phone?

2 A It varies. It could be two times a week,  
3 three times a week, and it's only for fifteen-minute  
4 increments, and then he gets cut off.

5 Q And what do you usually discuss with 12:37:56  
6 Mr. Jones on these phone calls?

7 A We usually discuss his -- his case.

8 Q I mean, was it appealed?

9 A Yes, it was appealed, and it was reversed.

10 Q And did you assist Mr. Jones with the 12:38:17  
11 appeal in any manner?

12 A No. He had a court-appointed counsel, and  
13 I did speak with him on just a couple of occasions,  
14 and that was it.

15 Q When you have these phone conversations 12:38:38  
16 with Mr. Jones about twice a week for 15 minutes  
17 each, do you ever discuss the business of Sitcomm?

18 A Sitcomm or Sitcomm Arbitration Association?

19 Q I was using those two names  
20 interchangeably. But is there a distinction between 12:39:01  
21 the two in your mind?

22 A Yes, ma'am. Mr. Jones has three  
23 organizations. He has Satcomm, Sitcomm Arbitration  
24 Association and Sitcomm, LLC.

25 Q And if you know, do you know what the 12:39:23

1 difference is between those three entities?

2 A Sitcomm he -- I believe he founded in 2012.

3 Q And this is Sitcomm, LLC?

4 A Yes.

5 Q And what does Sitcomm, LLC, do? 12:39:49

6 A I'm not 100 percent sure because I know  
7 that they're a foreign -- they're a foreign  
8 corporation.

9 Q And when you say they're a foreign  
10 corporation, where were they formed? What state? 12:40:15

11 A I think it was Nevis, but I'm not sure. I  
12 think it was Nevis.

13 Q Can you spell -- did you say Nevis?

14 A Yes, N-e-v-i-s.

15 Q And is that a city? 12:40:35

16 A No, that is a -- that is a -- that's a  
17 foreign island.

18 Q Oh.

19 A It's a -- it's a untarnished. So it's  
20 outside the United States. 12:40:56

21 Q All right. And other than the fact that  
22 it's a foreign LLC formed on the island of Nevis, do  
23 you know anything else about what Sitcomm, LLC,  
24 does?

25 A I -- I'm not sure because he has different 12:41:13

1 people that work for Sitcomm.

2 Q Okay. So let's move on to Sitcomm  
3 Arbitration Association, then. What does Sitcomm  
4 Arbitration Association do?

5 A Sitcomm Arbitration Association, what do 12:41:38  
6 they do?

7 Q Yes.

8 A So they are responsible for handling  
9 disputes between two different parties.

10 Q And do you know when this entity was 12:42:09  
11 formed?

12 A In January of 2019.

13 Q So it was formed at the time that you  
14 started working with Sitcomm Arbitration  
15 Association? Is that accurate? 12:42:27

16 A Yes. But when I first started working with  
17 Sitcomm, there was, like, a different director, and  
18 I wasn't really, like, involved in it as much  
19 because there were three or four different  
20 individuals who were working with Mr. Jones. 12:42:54

21 Q Who was the director that was working with  
22 Sitcomm Arbitration Association at that time in  
23 January 2019?

24 A That was Mr. Alan Hunt, H-u-n-t.

25 Q And you say that -- you said before the 12:43:17

1 break that Mr. Alan Hunt eventually left. When did  
2 Mr. Hunt leave?

3 A I think that Mr. Hunt was terminated by  
4 Mr. Jones.

5 Q And do you know why he was terminated? 12:43:35

6 A I think that it was for not sending out  
7 documentation in an appropriate manner, and I think  
8 it was for -- it was -- I don't know the specifics  
9 of it, but there was some kind of monetary issue,  
10 like, going on. So, in other words, I was told, not 12:44:17  
11 by Mr. Jones or by Mr. Hunt, that monies were paid  
12 to Mr. Hunt for not completing his assignments.

13 Q All right. And do you know where Mr. Hunt  
14 is now? Does he work for another company? Do you  
15 have any contact with him? 12:44:51

16 A I haven't ever really had any -- any  
17 contact with him, but I know he -- I think he's in  
18 the state of Missouri.

19 Q And you testified before the break that  
20 there was a new director that came in after 12:45:09  
21 Mr. Hunt. Who is that?

22 A Well, after the situation with Mr. Hunt,  
23 there really wasn't anybody that -- I think that  
24 Mr. Jones could trust. So he nominated me to be the  
25 director. 12:45:38

1 Q And what date was that that he nominated  
2 you to be the director?

3 A Well, Mr. Jones was taken into custody on  
4 May the 1st of 2019; so I want to say by, like, July  
5 or August of 2019. 12:46:09

6 Q And once Mr. Jones nominated you, did it  
7 have to go through any additional approval processes  
8 by Sitcomm Arbitration Association, or did that mean  
9 that you were officially the director of Sitcomm  
10 Arbitration Association? 12:46:28

11 A Hold on one second, ma'am. Okay. Sorry  
12 about that.

13 Q That's all right.

14 A Can you please repeat that because my  
15 roommate's dogs came in here. 12:46:49

16 Q Okay. Are the dogs still with you?

17 A No. They came in here and followed her  
18 around and left.

19 Q Okay. And your roommate is not in the room  
20 with you? 12:47:07

21 A No.

22 Q All right. So my question was, you  
23 testified that Mr. Jones nominated you to be the new  
24 director of Sitcomm Arbitration Association after  
25 Mr. Hunt (sic) was taken into custody. After 12:47:19

1 Mr. Jones nominated you in July or August of 2019,  
2 did that mean you automatically became the director,  
3 or was there -- were there other approval processes  
4 that were required before you became the official  
5 director of Sitcomm Arbitration Association? 12:47:36

6 A Well, as a matter of fact, at the time I  
7 was working with an individual by the name of --  
8 just bear with me for a minute. I know he's in  
9 Texas. Alden Bennett.

10 Q Ogden Bennett, and is that O-g-d-e-n 12:48:20  
11 B-e-n-n --

12 A No, no. A, as in apple, A-l-d-e-n.

13 Q Alden.

14 A Bennett, yes.

15 Q And was this individual also at Sitcomm 12:48:41  
16 Arbitration Association?

17 A No, he was with Satcomm.

18 Q Okay. So my question was: Did you  
19 officially become the director of Sitcomm  
20 Arbitration Association after Mr. Jones nominated 12:48:58  
21 you in July or August of 2019, or did other people  
22 have to approve? And are you saying that Alden  
23 Bennett had to approve you as a director, as well?

24 A No. There was actually a whole entire  
25 committee, and that consisted of Mr. Bennett, 12:49:17



1 Jacqueline Capa, Linnette Stanford, Kenzie Williams,  
2 Eric Taylor and Rod, but I forget Rod's last name.

3 Q All right. So Linnette Sanford, is that  
4 L-i-n-e-t-t-e?

5 A L-i-n-n-e-t-t-e. 12:50:11

6 Q Okay.

7 A Yes.

8 Q And Sanford is S-a-n-f-o-r-d?

9 A Yes, ma'am.

10 Q And then the next name you listed was 12:50:19

11 Ms. Capa. Can you spell her full name for us.

12 A J-a-c-q-u-e-l-i-n-e Capa, C-a-p-a.

13 Q And Mr. Williams, can you spell his full  
14 name for us.

15 A Mr. -- 12:50:44

16 Q I thought there was a Mr. Williams that  
17 came after Ms. Cava.

18 A Williams? Williams? Sorry. This was so  
19 long ago that I'm trying to remember. So there  
20 was -- there was Rod. Oh, yeah, Rod, Kyle Elikor, 12:51:14  
21 E-l-i-k-e-r, Jackie Capa, oh, Kenzie Williams,  
22 W-i-l-l-i-a-m-s, Michael Peterson and Lafrancis --  
23 Lafrancis -- I told you Linnette Sanford; right?

24 Q Yes.

25 A Okay. Lafrancis O'Neil. 12:52:32

1 Q Okay. Anyone else on that committee?

2 A Rod. Did I tell you Rod?

3 Q Yes.

4 A I don't -- I don't -- I don't remember his

5 last name. 12:52:54

6 Q Okay.

7 A Oh, Alaric, A -- Alaric, you know, Alaric,

8 A-l-a-r-i-c, Scott, Junior.

9 MR. POWERS: Just a second. For the

10 record, ma'am, did you mention an individual named 12:53:26

11 Eric Peeler as part of your answer?

12 THE WITNESS: Eric Taylor.

13 MR. POWERS: Taylor. I'm sorry. Thanks

14 for the clarification.

15 THE WITNESS: You're welcome. 12:53:39

16 BY MS. CHANG:

17 Q Is there anyone else you can recall that's  
18 on that committee? I know you've listed a number of  
19 names at this point.

20 A No, ma'am, not that -- not that I can 12:53:54  
21 recall.

22 Q Okay. So going back, Mr. Jones nominates  
23 you to be the new director of Sitcomm Arbitration  
24 Association in July or August of 2019. And then

25 does that nomination then go to this committee of 12:54:13

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1 people to vote on your nomination?

2 A Yes, ma'am, it does. And I can honestly  
3 say that all of these people on this committee  
4 they -- I can't think of one of them that has any  
5 kind of college background. I can't think of any 12:54:47  
6 kind of -- I can't think of any one of them that has  
7 any paralegal or law background either so --

8 Q Okay. And you have a paralegal  
9 certification, I believe, Ms. Goulette.

10 A Yes, ma'am. 12:55:14

11 Q And when did you get that certification?

12 A 1998.

13 Q And do you take continuing legal education  
14 courses in order to keep that certification up to  
15 date? 12:55:31

16 A No. As soon as I received that, I did get  
17 my master's degree in public administration and  
18 government law.

19 Q And when did you get that master's degree?

20 A In 1994. 12:55:49

21 Q And what institution did you receive the  
22 degree from?

23 A Murray State University.

24 Q I'm sorry. Could you spell that for me.

25 A Murray State University in Murray, 12:56:04

1 Kentucky. And then I got my master's in human  
2 development and leadership from Murray State  
3 University in Murray, Kentucky. And then I got my  
4 K through five teaching master's degree from the  
5 University of Cumberlands in Kentucky, and I taught 12:56:35  
6 on Fort Campbell in Clarksville, Kentucky.

7 Q When did you get that master's in -- was it  
8 human development from Murray State University?

9 A 2006.

10 Q And then when did you get the K through 12:57:07  
11 five teaching master's?

12 A 2008.

13 Q And do you have any other degrees in  
14 addition to the ones you've listed?

15 A No, ma'am. 12:57:22

16 Q All right. So you mentioned that none of  
17 the people on the committee that voted to approve  
18 you as director have college degrees or paralegal  
19 certifications. Is that -- is that correct?

20 A The only individual that I'm aware of, but 12:57:53  
21 this is not verified, is Linnette Sanford, who  
22 stated that she was a legal secretary.

23 Q All right. And given none of these people  
24 have college degrees, I assume they also -- none of  
25 them went to law school. 12:58:30

1 A Correct.

2 Q And to your knowledge, none of them are  
3 licensed as attorneys?

4 A Correct.

5 Q To your knowledge, none of them have 12:58:42  
6 practiced law?

7 A Correct.

8 Q Do you know what level of education  
9 Mr. Jones has?

10 A I know that he has a college education, but 12:58:52  
11 I cannot confirm for you what -- you know, what it  
12 is in.

13 Q Okay. And, to your knowledge, he has have  
14 never gone to law school?

15 A He hasn't? Is that what you said? 12:59:12

16 Q Yes. He has not gone to law school, to  
17 your knowledge?

18 A To my knowledge, no.

19 Q And he has never practiced law, to your  
20 knowledge? 12:59:22

21 A No.

22 Q All right. So these people on the  
23 committee, how long did it take them from the time  
24 that you were nominated by Mr. Jones to the time  
25 that they voted to make you director of Sitcomm 12:59:39

1 Arbitration Association, how long did that take?

2 A About two weeks.

3 Q And have you met each of the people on the  
4 committee?

5 A Have I left them? 12:59:53

6 Q Met them, met them in person, met them over  
7 the phone, met them over video.

8 A I've met them over the phone, and I've met  
9 them over video.

10 Q All right. So then in -- let's say 01:00:12  
11 sometime in the summer or fall of 2019, you became  
12 the director of Sitcomm Arbitration Association.  
13 Did your responsibilities at Sitcomm change at that  
14 point?

15 A Yes. I was responsible for the mail. 01:00:30

16 Q And is this before you became director or  
17 after?

18 A After.

19 Q After. Okay. I'm skipping around a lot,  
20 and that's because you're giving us a lot of useful 01:00:53  
21 information. So I'm trying to gather it all in my  
22 head and make sure that we're covering all the bases  
23 that we need to. But why don't you first describe  
24 what your responsibilities were in January of 2019  
25 when you joined Sitcomm Arbitration Association. 01:01:08

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1           A     You mean why did I -- why did I join in  
2     January 2019?

3           Q     We can start there. Why did you join in  
4     January of 2019?

5           A     Primarily because I wanted to learn. I           01:01:25  
6     was -- I was familiar with the National -- the  
7     National Arbitration -- the National Arbitration  
8     Association. Right? And I was intrigued by some of  
9     the things that they had to say. So I just wanted  
10    to learn about the FAA.                                   01:01:56

11          Q     And when you say the FAA, you mean the  
12    Federal Arbitration Association or the Federal --

13          A     No, the Federal Arbitration Act, 9 USC  
14    Section 1 through 16.

15          Q     Okay. And at the time that you joined           01:02:16  
16    Sitcomm Arbitration Association in January of 2019,  
17    were you employed elsewhere before you joined?

18          A     No.

19          Q     No. Did you have a job prior to  
20    January 2019?   01:02:38

21          A     Yeah, I did. I worked overseas. I worked  
22    in Egypt, and I worked in Libya. I was a full-time  
23    teacher.

24          Q     And where were you -- go ahead. No, go  
25    ahead. Finish your sentence.                           01:02:57

1           A     I worked for Harvard University School of  
2     Dental Medicine. I was an administrative assistant  
3     to the dean of the school.

4           Q     And who was the dean? What is the name of  
5     the dean of the school? 01:03:14

6           A     Oh, my gosh. He passed away several years  
7     ago. But his predecessor who took his place, her  
8     name was Joan Fink, and I -- I worked very closely  
9     with her.

10          Q     And that was your job prior to joining 01:03:37  
11     Sitcomm in January of 2019, is working in Egypt and  
12     Libya teaching?

13          A     Yes.

14          Q     What were you teaching in Egypt and Libya?

15          A     In Egypt I was teaching second grade, and 01:03:51  
16     in Libya I was teaching third grade.

17          Q     And were you teaching in English?

18          A     No, I was teaching all of the courses  
19     because the children at the American international  
20     schools, they could all speak English. 01:04:08

21          Q     Okay. So you were teaching subjects all in  
22     English, not in a different language?

23          A     Correct.

24          Q     When did you return to the United States?

25          A     In 2012. 01:04:22



1 Q And in 2012 when you returned to the United  
2 States, what were you doing at that time?

3 A Nothing. It was very difficult to find  
4 work.

5 Q So how long were you unemployed from the 01:04:37  
6 time that you returned to the United States in 2012  
7 until -- well, did you ever find a job in between  
8 2012 and starting to work with Sitcomm in January of  
9 2019?

10 A No. Because during that time, my mother 01:04:52  
11 had gotten really sick. She just recently passed  
12 away this past summer. So I moved in with her, and  
13 I became her primary caregiver.

14 Q Well, I'm sorry to hear that. My  
15 condolences. 01:05:13

16 A Thank you.

17 Q Now, in January 2019, you described why you  
18 joined Sitcomm. You were very interested in the  
19 Federal Arbitration Act. What in particular about  
20 Sitcomm Arbitration Association caused you to want 01:05:29  
21 to join this particular company versus another  
22 arbitration company?

23 A I think that they -- the way that they  
24 portrayed it is that they were up and coming.  
25 Mr. Jones is very, very knowledgeable about the FAA. 01:05:57

1 I learned quite a bit from him. I also did quite a  
2 bit of studying on my own. I don't, you know,  
3 necessarily just take one person's perspective.  
4 That's just never -- never been in my nature. I  
5 studied the Supreme Court Justice Cavanaugh to a 01:06:25  
6 great extent and all of the case law, prior case law  
7 and everything else. And I found that basically  
8 what Mr. Jones was reaching, you know, the  
9 conclusions of, it was pretty synonymous to what I  
10 had found myself. 01:07:04

11 Q And you did mention at the very beginning  
12 of the deposition that, you know, you've been a  
13 little bit sick and ill and you're getting better  
14 and you do want to get back to going to law school.  
15 Did you attend law school at any point in the past 01:07:23  
16 or currently?

17 A Well, many, many years ago when I lived in  
18 Boston, I was accepted to Suffolk, and I didn't  
19 stay. Upon entry I had a pretty horrible time with  
20 peers, and I decided not to stay. And so shortly 01:07:59  
21 thereafter I did get married. My husband was a  
22 soldier in the United States Army. We began to  
23 have, you know, our children, and I did not graduate  
24 even until 1998 when my last child was born. And  
25 once we moved to 101st Airborne is when I decided to 01:08:27

1 go back to school and pursue my first degree in  
2 public administration government law.

3 Q Okay. I'm just going to clean up some of  
4 that because I didn't hear all of it, and maybe the  
5 court reporter didn't get it, as well. But you said 01:08:52  
6 you were accepted to Suffolk while you were in  
7 Massachusetts. Is that the institution?

8 A Suffolk, yes.

9 Q Suffolk. And that's a four-year college,  
10 or what is that institution? 01:09:05

11 A Suffolk University Law School is a very  
12 well-known law school in Boston.

13 Q Okay. And so you -- did you take the LSATs  
14 before you applied?

15 A No. I wasn't required to because my grades 01:09:24  
16 were very well -- very good. So I wasn't required  
17 to take an LSAT test.

18 Q Okay. And -- go ahead.

19 A I am required to now because of the time  
20 lapse, and so I've been studying to do that. And 01:09:54  
21 it's not -- you know, as you can see, it's not --  
22 it's really not that hard. If you do it once, you  
23 can probably do it again but --

24 Q So I didn't ask this question. But where  
25 did you go for undergrad, and what degree did you 01:10:27

1 get?

2 A I went to a private college. I went to  
3 Champlain College in Burlington, Vermont, and I got  
4 my undergrad in paralegal, and then I got my  
5 bachelor's of science degree. 01:10:41

6 Q And what years was that?

7 A I graduated in 1998.

8 Q All right. So you were accepted into  
9 Suffolk. And was it your testimony that you didn't  
10 get along with your peers? Did I hear that 01:10:59  
11 correctly?

12 A I wasn't -- I wasn't accepted, like, right  
13 after I graduated from -- from Champlain in 1998,  
14 and it wasn't necessarily that I did not get along  
15 with all my peers. It was more or less an issue of 01:11:25  
16 I did not get along with my professors.

17 Q So how long were you enrolled at Suffolk  
18 before you left?

19 A Not even a month.

20 Q And you never returned to Suffolk? 01:11:48

21 A Never returned to Suffolk, no.

22 Q All right. And so then you said you got  
23 married. Are you still currently married?

24 A No.

25 Q What year did you get married? 01:12:02

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1 A We got married in 1992.

2 Q And what was your -- what is the name of  
3 your then husband?

4 A Kevin Goulette.

5 Q And when did you get divorced? 01:12:19

6 A We got divorced in 1996.

7 Q And you mentioned that you had children  
8 with Mr. Goulette. How many children and what are  
9 their names and ages?

10 A I had three children. Jacob was born in 01:12:34  
11 1994. Nicholas was born in 1998 -- 1996. Megan was  
12 born in 1998, the year that I graduated from  
13 Champlain College.

14 Q All right. And you mentioned that you have  
15 a roommate. Who is that roommate? 01:12:58

16 A The roommate here where I'm at now?

17 Q Yes. Correct.

18 A Her name is Denise.

19 Q Denise?

20 A Yes. 01:13:14

21 Q And what's her last name?

22 A Brown.

23 Q Does she work for Sitcomm Arbitration  
24 Association?

25 A No. 01:13:24

1 Q And how long has Denise Brown been your  
2 roommate?

3 A For three years.

4 Q All right. So going back, you haven't been  
5 enrolled in another law school since Suffolk, but 01:13:44  
6 you're currently practicing to take your LSATs  
7 again. Is that -- is that an accurate assessment of  
8 where you are in that path?

9 A Absolutely. Although, over the past of the  
10 course five years -- the past five years, more and 01:14:07  
11 more law schools are not requiring L -- you know,  
12 the test to get in, especially out in California.

13 Q Okay. So going back to when you joined  
14 Sitcomm Arbitration Association in January 2019,  
15 what was your title at that time? 01:14:29

16 A Just arbitrator secretary.

17 Q So secretary to an arbitrator but not an  
18 arbitrator; correct?

19 A Right. I scheduled. I scheduled hearings.  
20 I took care of accounting. I sent out notices, sent 01:14:48  
21 out contracts, and I was -- I was scheduling  
22 arbitration hearings, yeah.

23 Q And how many arbitrators did you act as  
24 secretary for at that time?

25 A At that time we actually had nine 01:15:17

1 arbitrators.

2 Q And you did all of the scheduling and  
3 notices for all nine?

4 A Correct.

5 Q Were you the only secretary to the 01:15:35  
6 arbitrators at Sitcomm at that time?

7 A Correct.

8 Q Have there been any other secretaries since  
9 January 2019 other than you?

10 A No. 01:15:47

11 Q So when you then became the director of  
12 Sitcomm Arbitration Association sometime in, let's  
13 say, August or September of 2019, did you continue  
14 with all of those responsibilities that you had as  
15 secretary to the arbitrators? 01:16:05

16 A Absolutely, yes. Because I did not feel  
17 and nor did Mr. Jones that anyone, you know, could  
18 handle those responsibilities, and, you know, it  
19 just wouldn't have -- it just wouldn't have worked  
20 out. 01:16:30

21 Q And how did your responsibilities increase  
22 at the time that you became director in August or  
23 September of 2019?

24 A I would be responsible for handling any  
25 complaints. 01:16:54

1 Q What do you mean by --

2 A -- and customer --

3 Q Go ahead. Go ahead.

4 A That's okay. Any customer service

5 questions, inquiries, comments, anything about 01:17:05

6 arbitration procedure, how long does it take, you

7 know, things of that nature, which, you know, I

8 could answer depending upon how the question was

9 posed. Certain questions in regard to, you know,

10 what's my arbitrator going to do, I could not answer 01:17:33

11 those questions. What can I do once I, you know,

12 receive my award? I could not answer those

13 questions. I made it very clear to every single

14 client that I was not privy to that information nor

15 could I disclose that kind of information to them. 01:18:06

16 Q And when you joined Sitcomm Arbitration

17 Association in January 2019, what was your salary at

18 that time?

19 A My salary -- I was considered a

20 subcontractor. I didn't have a salary. 01:18:23

21 Q How were you paid, if at all?

22 A Well, basically individuals as

23 subcontractors are paid according to the work that

24 they complete. So if -- you know, if they're asked

25 to answer ten emails, then Mr. Jones would, you 01:18:55



1 know, compensate them for doing things of that  
2 nature. And back then that would be between  
3 Mr. Jones, Mr. Alan. So I could not possibly give  
4 you a figure.

5 Q But you were paid by task essentially? 01:19:23

6 A Yes.

7 Q Do you have an idea of how much you earned  
8 with Sitcomm, just a ballpark estimate, as a  
9 secretary to the arbitrators prior to becoming a  
10 director? 01:19:44

11 A Well, I -- I didn't -- I didn't have, like,  
12 you know A, B, C, D things that I -- that I  
13 necessarily got compensated for. If I answered  
14 emails and I gave clients a substantial response --  
15 right? -- that I thought, you know, they would -- 01:20:14  
16 they would feel satis -- satisfied -- you know what  
17 I mean? -- then I would be consti -- I would be  
18 constip -- I can't talk today.

19 Q That's all right. And if we need a break,  
20 just let me know. But continue. 01:20:36

21 A I would be -- I would be con --  
22 compensated, like, \$5 for -- you know, per  
23 substantial email that I would, you know, respond to  
24 a client. So if I just said something like, you  
25 know -- well, you know, we'll get to it when we get 01:21:04

1 to it or, you know, something that I would never  
2 say -- you know what I mean? -- or, you know, you'll  
3 just have to be patient. You know, I would actually  
4 take the time and explain the process to the client,  
5 and that is something that would -- that, you know, 01:21:32  
6 warrants the \$5 of compensation for doing something  
7 like that.

8 Q All right. Did you ever get paid per  
9 application that you processed?

10 A No. 01:21:53

11 Q So you were just really getting paid by --  
12 by email?

13 A Right. Because the applications would come  
14 in along with the request for dispute resolution and  
15 the proof of payment and a copy of the contract. 01:22:16  
16 Okay? At that point, I would just take all that  
17 information, make sure that, you know, names were  
18 correct, addresses were correct, things of that  
19 nature. And then I would take all those documents  
20 and send out hearing notifications so that all of 01:22:44  
21 the parties involved received the same  
22 documentation. And I think -- don't quote me on  
23 this. But I think for doing all of that we were --  
24 we were compensated, like, \$10.

25 Q Okay. So it sounds like you were 01:23:14

1 compensated maybe \$10 for each application and the  
2 whole processing of that application.

3 A Yeah. Once everything was submitted, yes.

4 Q All right. You testified that there were  
5 situations where, you know, those four prerequisites 01:23:35  
6 in the application were not complete in some  
7 fashion, and you had to send the file back to the  
8 client, basically reject it and not -- and not pass  
9 it along to an arbitrator. In those situations,  
10 were you still paid \$10, or were you not paid 01:23:53  
11 because it was a rejected file?

12 A No, I wasn't paid. Because it wouldn't  
13 have even gone out. The hearing notifications would  
14 not have gone out. And so what we would do is just  
15 out of like a common courtesy type of situation, you 01:24:12  
16 know, we would say, okay, well, thank you for  
17 submitting your application. Thank you for  
18 submitting the contract, but we still need the proof  
19 of service, and then we can send it out. And then  
20 once it's sent out, that person would receive the 01:24:31  
21 \$10 compensation.

22 Q Got it. Now, when you became director in  
23 August or September of 2019, did your compensation  
24 structure change?

25 A Not a whole lot. 01:24:50

1 Q So you got a promotion -- go ahead.

2 A Right now because Brett has these three  
3 organizations and he's incapacitated, to say the  
4 least, I have been helping him with all three of the  
5 organizations. Over the past six months, you know, 01:25:26  
6 people have -- people have not answered emails  
7 correctly and kind of let, you know, the clients'  
8 papers, you know, slip, things like that. So, you  
9 know, I let him know on every occasion, but he also  
10 wants me to let them know that, you know, until it 01:26:01  
11 gets fixed and until the customer is happy, they  
12 will not be receiving their grant funds.

13 Q Now, at the time that you became the  
14 director, did they hire any additional, meaning  
15 Brett Jones, did he hire anyone additional to assist 01:26:26  
16 you with operating Sitcomm Arbitration Association?

17 A No, ma'am.

18 Q Now, let's talk about the arbitrators. You  
19 said that at the time that you started working as a  
20 secretary for Sitcomm Arbitration Association there 01:26:55  
21 were nine arbitrators. Do you recall their names?

22 A Yes. We had Timothy Simpson, and he was  
23 located in Nashville, Tennessee. Steven -- it will  
24 come to me. Keisha Jones, she is in Georgia. There  
25 was another lady named Tracy, and she was in 01:27:55

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1 Tennessee. Alden Bennett, yeah, Alden Bennett, and  
2 he was in Texas. Alan Hunt, even though he was a  
3 director, he was doing arbitrations, and he's in  
4 Missouri. And then I can't forget -- I can't  
5 remember the other person. 01:29:05

6 Q Okay. Well, just as we left a blank  
7 earlier in the deposition transcript, you know,  
8 you've listed six names now, if you can remember the  
9 other three once you see the deposition transcript,  
10 you can fill that in on the transcript. Okay? 01:29:22

11 A Okay.

12 INFORMATION REQUESTED: \_\_\_\_\_

13 \_\_\_\_\_

14 BY MS. CHANG:

15 Q Now, the people you've named, do you know 01:29:28  
16 if any of them were law school graduates?

17 A There was an individual named -- he was in  
18 Texas, too -- Gonzo.

19 Q Is that G-o --

20 A G-o-n-z-o. I think his real name was 01:30:05  
21 Mark -- Mark -- I'll find it. But shortly after  
22 Brett went to jail, I took a look at Mark's résumé,  
23 and it was stated that he graduated from law school  
24 in New York; although, New York has no record of him  
25 graduating law school. And then he further told a 01:31:01

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1 couple people that he was disbarred in Texas, and  
2 when I looked at the -- Lily, stop. I'm sorry, you  
3 guys. When I looked at the Texas Bar Association,  
4 Mark was never -- was never part of that. He also  
5 said that his mother was an attorney and she 01:31:45  
6 owned it. She actually owned an insurance company.  
7 And I couldn't find her. Well, he said she was a  
8 judge, but I couldn't find her either.

9 And so Gonzo wanted to be a part of SAA,  
10 like, desperately, and I had to do some checking 01:32:22  
11 into him. And when I did do some checking into him,  
12 I found out that he's had a pretty ongoing and to  
13 this day serious narcotics issue. And I also found  
14 out that he had his children taken away from him and  
15 that you know -- you know, this isn't about 01:33:03  
16 retaliation. I feel -- I feel bad for him. But  
17 then I had to stop and think even -- excuse me --  
18 even if all of these things were alleged --  
19 right? -- and even if before he went to court and  
20 everything, it was, like, shortly thereafter that he 01:33:44  
21 was indicted. And I have a copy of his résumé,  
22 which is, you know, almost unheard of to be a nurse  
23 and then an attorney and a professional, you know,  
24 veterinarian. And I mean it just goes on and on and  
25 on. Right? 01:34:20

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1           And then Gonzo I found out took quite a bit  
2   of money from a few of my friends, which really hurt  
3   my feelings because they were already down and out  
4   as it was losing their houses and stuff. So I --

5           Q     What -- 01:34:45

6           A     -- haven't talked to him.

7           Q     Sorry. What did Gonzo take money from your  
8   friend for, or was he representing that he was going  
9   to assist them with not losing their homes?

10          A     No. Gonzo took money from them saying 01:35:11

11   that -- that he could use some kind of, like,  
12   sheik-like sovereign citizen. Like, you know, he's  
13   big into that, like that kind of stuff, ran patents  
14   and discharging debt for mortgages and all this kind  
15   of weird stuff. And I'm not talking about, you 01:36:02  
16   know, just like a little bit of money here and  
17   there. I'm talking about thousands of dollars that  
18   he did this to some of my friends for. And then  
19   like they didn't have money to eat even for a long  
20   time. So it was kind of sad. So I wasn't going to 01:36:28  
21   let Gonzo have anything to do with Sitcomm, SAA.

22           But he also got into some serious trouble  
23   last year. He called me up and he said that he got  
24   busted for marijuana, and he was going to get his  
25   kids taken away. And I kind of called his bluff, 01:37:02

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1 and I said, "You know, Gonzo, unless you have like a  
2 lot of marijuana -- you know what I mean? -- people  
3 aren't really out to take kids away anymore, you  
4 know." And then I got a phone call like a week  
5 later that they wanted to do, like, a hair test on 01:37:29  
6 him, and they found heroin, and they found this, and  
7 they found that. And they did take the kids away.  
8 But I guess what bothered me the most was the fact  
9 that Gonzo was doing this in front of his kids, and  
10 I thought that, you know, that was really sad, and 01:38:07  
11 also he lied.

12 Q Well, you know, that's -- that's  
13 unfortunate but -- so from what I can gather from  
14 your testimony, he was never made an arbitrator of  
15 Sitcomm Arbitration Association because of all these 01:38:31  
16 red flags that you just described. Correct?

17 A Correct. But his address in Texas --  
18 okay? -- the -- what is it? The 1001 address in  
19 Texas where he was serving as our resident agent,  
20 and he was -- he was getting our mail, you know, and 01:38:57  
21 doing all this stuff at the same time. He never  
22 ever ever gave us our mail.

23 Q And who authorized him to serve as Sitcomm  
24 Arbitration Association's registered agent?

25 A That would be Brett. 01:39:20



1 Q Brett. Okay. And I just had one question.  
2 You said that you received Gonzo's résumé after  
3 Brett had been -- had gone to prison. When did  
4 Brett go to prison, and was he in prison when you  
5 joined Sitcomm in January of 2019? 01:39:44

6 A No, Brett didn't go to prison until May 1st  
7 of 2019. Brett had -- he had Gonzo's résumé before  
8 that. I guess he just never checked into it.  
9 Because as soon as I got a hold of it, I checked  
10 into it, and I was like there's no way. You can't 01:40:13  
11 get through law school in two years and -- well,  
12 maybe you can if you're a genius. Right? But Gonzo  
13 is not a genius.

14 Q Okay. Now, when you -- when you joined  
15 Sitcomm Arbitration Association in January of 2019, 01:40:41  
16 Brett was not incarcerated. Brett Jones was not  
17 incarcerated; correct?

18 A Correct.

19 Q Did you ever meet him in person before he  
20 went -- 01:40:55

21 A No.

22 Q So you've never met him in person, period?

23 A Hmm-um.

24 MS. CHANG: All right. Well, you know, I  
25 think it's been a little bit more than an hour. Why 01:41:02

1 don't we take a 20-minute break at this point, if  
2 that's okay with you, Ms. Goulette, and go back on  
3 the record around 2:00 Pacific Time, 4:00 your time  
4 in Mississippi.

5 THE VIDEOGRAPHER: Sounds good. We are now 01:41:22  
6 going off the record. The time is 1:41 p.m. Pacific  
7 Standard Time.

8 (Recess taken.)

9 THE VIDEOGRAPHER: We are now back on the  
10 record. The time is 3:05 p.m. 03:05:49

11 MS. CHANG: All right.

12 MR. POWERS: This is Harris Powers on the  
13 record also as local counsel.

14 MS. CHANG: Okay. Thank you, Mr. Powers.  
15 This is Cheryl Chang. As we broke for a 15- or 03:06:00  
16 20-minute break back at 1:40 p.m. Pacific, 3:40 p.m.  
17 Central Time, we all came back at 2:00 p.m. Pacific  
18 and 4:00 p.m. Central Time as we agreed to after a  
19 20-minute break. Mr. Powers, the court reporter and  
20 videographer and myself have been here waiting since 03:06:28  
21 2:00 p.m. Pacific, 4:00 p.m. Central, and it's now  
22 3:06 p.m. Pacific and 5:06 p.m. Central, and we have  
23 not been able to reach Ms. Goulette. I have called  
24 her twice and left her two voicemails, and I've now  
25 sent her three emails just trying to follow up with 03:06:50

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1 her because I wasn't able to reach her on her phone.  
2 My co-counsel in Los Angeles, Nicole Metral, has  
3 also tried calling Ms. Goulette and left a voicemail  
4 and has been unable to reach her, as well.

5 Since it does not appear that the witness 03:07:06  
6 is returning to the deposition, we will suspend the  
7 deposition for now, and we will coordinate with her  
8 to reconvene and continue her deposition to a later  
9 date and time.

10 I will mark as Exhibit 5 an email exchange 03:07:23  
11 that I have been sending to Ms. Goulette at her  
12 email address at sandy@saalimited.com. The email  
13 chain is carbon copied to Nicole Metral, Harris  
14 Powers and my other colleague in LA, Jessica  
15 McElroy, and we'll make that Exhibit 5 to the 03:07:49  
16 deposition.

17 (Exhibit 5 was marked for identification.)

18 MS. CHANG: Anything else I need to add,  
19 Mr. Powers?

20 MR. POWERS: Just verify that Ms. Chang has 03:07:54  
21 had the benefit of local counsel during this  
22 deposition consistent with the Uniform Rules of  
23 Practice for the northern and southern districts of  
24 Mississippi. There have been numerous good faith  
25 attempts made by Ms. Chang to resolve what I 03:08:13

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1 perceive as to be a discovery dispute under Rule 30  
2 and Rule 37 of the Federal Rules of Civil Procedure.  
3 And to the extent that further efforts are made to  
4 resolve this discovery dispute and go unresponded  
5 to, this is our record that's being made in support 03:08:35  
6 of a motion to compel and a motion for sanctions  
7 pursuant to the Federal Rules of Civil Procedure and  
8 the local rules of practice.

9 MS. CHANG: Thank you, Mr. Powers. I join  
10 in all of that, and with that I think we can go off 03:08:49  
11 the record.

12 MR. POWERS: Good evening, everyone. And  
13 I'm going to shoot you a quick email, Cheryl.

14 MS. CHANG: Okay. All right. And, Lisa,  
15 I'm going to send you -- and I'll send it to 03:09:00  
16 Jonathan, as well, just, you know, in case. I'll  
17 just follow on that last email. I will forward you  
18 all the exhibits for today. And I don't need a  
19 rough right away, but it would be nice and  
20 interesting to see what we've got so far. So if you 03:09:14  
21 can get it to me by the end of the week, that would  
22 be fabulous.

23 THE REPORTER: I can do that.

24 MS. CHANG: All right.

25 THE VIDEOGRAPHER: Okay. We're now going 03:09:22

1 off the record, and this concludes the video  
2 deposition of Sandra Goulette. The time is  
3 3:09 p.m. Pacific Standard Time.

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5 (TIME NOTED: 3:09 P.M. PST.)  
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1  
2  
3 I, SANDRA GOULETTE, do hereby declare under penalty  
4 of perjury that I have read the foregoing transcript;  
5 that I have made any corrections as appear noted, in ink,  
6 initialed by me, or attached hereto; that my testimony as  
7 contained herein, as corrected, is true and correct.

8  
9 EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,  
10 2020, at \_\_\_\_\_, \_\_\_\_\_.  
(City) (State)

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SANDRA GOULETTE  
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1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth; that  
6 any witnesses in the foregoing proceedings, prior to  
7 testifying, were administered an oath; that a record of  
8 the proceedings was made by me using machine shorthand  
9 which was thereafter transcribed under my direction;  
10 that the foregoing transcript is a true record of the  
11 testimony given.

12 Further, that if the foregoing pertains to  
13 the original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review of the  
15 transcript [ ] was [ ] was not requested.

16 I further certify I am neither financially  
17 interested in the action nor a relative or employee of  
18 any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21 Dated: December 22, 2020

22   
23

24 LISA ANDREASEN

25 CSR No. 9584, RPR

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[&amp; - address]

| <b>&amp;</b>  | <b>2</b>   | <b>4</b>                                | <b>a.m.</b> 2:17 5:2,5<br>12:7 15:12 16:18                               |
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| <b>00193</b> 1:6 2:6 5:12                             | <b>2006</b> 59:9   | <b>424.239.3400</b> 3:8                 | <b>absurd</b> 43:5   |
| <b>1</b>  | <b>2008</b> 59:12  | <b>4367213</b> 1:24                     | <b>abuse</b> 48:5  |
| <b>1</b> 1:25 4:8 5:6<br>11:23 12:3,16<br>39:14 62:14 | <b>2012</b> 51:2 63:25<br>64:1,6,8   | <b>4:00</b> 81:3,18,21                  | <b>accepted</b> 65:18<br>66:6 67:8,12                                    |
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**[cavanaugh - convicted]**

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**[conviction - direction]**

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[directly - extremely]

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[metral - okay]

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| 76:20 77:17 80:25<br>83:10<br><b>third</b> 16:2 63:16<br><b>thought</b> 9:8 56:16<br>72:15 79:10<br><b>thousand</b> 21:10<br><b>thousands</b> 78:17<br><b>three</b> 50:3,22 51:1<br>52:19 68:10 69:3<br>75:2,4 76:9 81:25<br><b>time</b> 5:25 6:9 9:22<br>11:13 12:8 13:20<br>16:3,5,18,18 18:1<br>18:1,3 19:9 21:15<br>28:3 37:14,15<br>38:5 42:20 44:16<br>46:18 49:6,11,12<br>52:13,22 55:6<br>60:23,24 62:15,22<br>64:2,6,10 65:19<br>66:19 69:15,24,25<br>70:6,22 71:18<br>73:4 75:13,19<br>78:20 79:21 81:3<br>81:3,6,7,10,17,18<br>82:9 84:2,3,5 86:5<br><b>times</b> 17:24 21:10<br>36:11 50:2,3<br><b>timothy</b> 75:22<br><b>tiring</b> 21:25<br><b>title</b> 27:16 69:15<br><b>today</b> 6:20 7:4,12<br>7:19 8:4,11,25<br>9:11 16:10,17<br>28:5 29:20 39:22<br>40:6,25 72:18<br>83:18<br><b>today's</b> 17:10<br>19:25 20:8 23:16<br>23:19,20 24:1,6<br>25:6 28:6 29:4,6 | 30:13,13 37:12<br>39:4,5<br><b>told</b> 16:23 53:10<br>56:23 76:25<br><b>tomorrow</b> 17:9<br><b>top</b> 37:6 40:7<br><b>touch</b> 32:14<br><b>tracy</b> 75:25<br><b>transcribed</b> 86:9<br><b>transcript</b> 7:11<br>27:11,19 30:13,16<br>30:22 31:4,5 76:7<br>76:9,10 85:4<br>86:10,13,15<br><b>treatment</b> 40:17<br><b>tree</b> 44:2<br><b>trial</b> 9:2 19:22<br><b>tried</b> 82:3<br><b>trouble</b> 46:13<br>78:22<br><b>true</b> 85:7 86:10<br><b>trust</b> 53:24<br><b>truthfully</b> 7:3 8:7<br><b>try</b> 9:9 10:2 21:5,8<br>21:23 22:2<br><b>trying</b> 36:1,6<br>56:19 61:21 81:25<br><b>tuesday</b> 1:17 2:17<br>5:1,5<br><b>twice</b> 50:16 81:24<br><b>two</b> 6:10 36:12,24<br>44:14 50:2,19,21<br>52:9 61:2 80:11<br>81:24<br><b>type</b> 18:4 41:25<br>43:3 74:15<br><b>types</b> 25:12<br><b>typically</b> 23:6,21 | <b>u</b><br><b>u</b> 45:10 52:24<br>56:12<br><b>um</b> 41:5 80:23<br><b>unable</b> 28:15<br>42:24 82:4<br><b>undergrad</b> 66:25<br>67:4<br><b>undersigned</b> 86:1<br><b>understand</b> 7:17<br>8:3,8,9,12,14 9:3<br>9:16 18:11 20:23<br>29:13 33:17 36:6<br>37:10 40:2<br><b>understood</b> 8:21<br><b>unemployed</b> 64:5<br><b>unfortunate</b> 79:13<br><b>unfortunately</b><br>42:23<br><b>unheard</b> 77:22<br><b>uniform</b> 82:22<br><b>unit</b> 5:6 36:22<br><b>united</b> 1:1 2:1 5:9<br>37:19 51:20 63:24<br>64:1,6 65:22<br><b>university</b> 58:23<br>58:25 59:3,5,8<br>63:1 66:11<br><b>unquote</b> 25:1 38:1<br><b>unresponded</b> 83:4<br><b>untarnished</b> 51:19<br><b>upshaw</b> 3:12 6:6<br><b>upshawwilliams...</b><br>3:18<br><b>urgent</b> 11:14<br><b>usc</b> 62:13<br><b>use</b> 9:2,21 13:17<br>33:16 78:11<br><b>useful</b> 61:20<br><b>usually</b> 50:5,7 | <b>v</b><br><b>v</b> 51:14<br><b>valid</b> 24:22 38:15<br><b>variables</b> 36:17<br><b>varies</b> 50:2<br><b>various</b> 15:1 39:23<br><b>verbal</b> 7:14<br><b>verbally</b> 7:8<br><b>verified</b> 59:21<br><b>verify</b> 82:20<br><b>veritext</b> 5:15,17<br>15:12<br><b>vermont</b> 67:3<br><b>versus</b> 5:8 26:16<br>26:18 64:21<br><b>veterinarian</b> 77:24<br><b>video</b> 1:15 2:14<br>5:7 7:12 8:17,24<br>61:7,9 84:1<br><b>videographer</b> 3:21<br>5:4,16 6:10,11<br>7:12 49:5,10 81:5<br>81:9,20 83:25<br><b>videos</b> 44:16 46:17<br>46:24<br><b>visitation</b> 48:23<br><b>voicemail</b> 82:3<br><b>voicemails</b> 81:24<br><b>volume</b> 1:18 2:15<br>4:3<br><b>vote</b> 58:1<br><b>voted</b> 59:17 60:25<br><b>vs</b> 1:6 2:6<br><b>w</b><br><b>w</b> 56:22<br><b>wait</b> 9:10<br><b>waiting</b> 81:20<br><b>walk</b> 9:22<br><b>want</b> 9:14,15<br>12:11 21:5 27:3,5 |
|---|---|---|---|



[want - zoom]

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| 27:9 29:23 36:9<br>36:24 54:4 64:20<br>65:14<br><b>wanted</b> 34:19<br>35:12,16 38:17<br>62:5,9 77:9 79:5<br><b>wants</b> 75:10<br><b>warrants</b> 73:6<br><b>water</b> 21:22<br><b>way</b> 24:13 38:13<br>64:23 80:10<br><b>we've</b> 14:17 83:20<br><b>week</b> 47:19 50:2,3<br>50:16 79:4 83:21<br><b>weeks</b> 29:7,10,15<br>30:2,23 37:14<br>39:2 40:9 61:2<br><b>weird</b> 78:15<br><b>welcome</b> 57:15<br><b>went</b> 46:16 47:16<br>47:16 59:25 67:2<br>67:2 76:22 77:19<br>80:20<br><b>whatnot</b> 43:6<br><b>whereof</b> 86:19<br><b>williams</b> 3:12 6:6<br>56:1,13,16,18,18<br>56:21<br><b>willing</b> 17:14<br><b>wired</b> 21:16<br><b>wise</b> 43:17<br><b>witness</b> 2:16 4:2<br>6:12 19:7,14<br>20:23 21:2,8,11,18<br>22:4 49:4 57:12<br>57:15 82:5 86:19<br><b>witnesses</b> 86:6<br><b>words</b> 38:2 53:10<br><b>work</b> 18:21,21,24<br>21:3,17 52:1<br>53:14 64:4,8 | 68:23 71:23<br><b>worked</b> 18:19 19:2<br>62:21,21,22 63:1,8<br>70:19<br><b>working</b> 52:14,16<br>52:20,21 55:7<br>63:11 75:19<br><b>write</b> 30:15<br><b>wrong</b> 35:11 38:4   |
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|  | <b>yeah</b> 28:2 35:25<br>39:9,20 45:22<br>56:20 62:21 69:22<br>74:3 76:1<br><b>year</b> 29:22 37:6,11<br>42:22 47:18 66:9<br>67:25 68:12 78:23<br><b>years</b> 18:2 46:12<br>63:6 65:17 67:6<br>69:3,10,10 80:11<br><b>yesterday</b> 40:10<br><b>york</b> 76:24,24<br><b>youtube</b> 44:17<br>46:17 |
|  | <b>z</b>   |
|  | <b>z</b> 76:20<br><b>zoom</b> 5:14 6:24<br>10:6 15:13 17:2   |

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**Eastern Division**

PENNYMAC LOAN SERVICES, LLC,

CIVIL ACTION

**Case No: 2:19-cv-00193-KS-MTP**

Plaintiff,

-VS-

SITCOMM ARBITRATION  
ASSOCIATION, MARK MOFFETT,  
SANDRA GOULETTE, RONNIE  
KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT,

Defendants.

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF  
DEPOSITION OF DEFENDANT SANDRA GOULETTE PURSUANT TO  
FED. R. CIV. P. 26 AND 30**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

DEPONENT: SANDRA GOULETTE

DATE: December 7, 2020

TIME: 11:00 a.m. Central Standard Time

LOCATION: Remote by videoconference. See Exhibit A. Contact Veritext's calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition.

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, plaintiff PennyMac Loan Services, LLC (“PennyMac”) will take the deposition by oral examination of defendant Sandra Goulette (“Deponent”) on December 7, 2020 at 11:00 a.m. Central Standard Time via remote video conference pursuant to Exhibit A.

The remote deposition will be coordinated by Veritext Legal Solutions, with a business address of 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017. Contact Veritext’s calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition, as well as information related to any technical assistance you may require to assist with carrying out the virtual deposition. We encourage you to access [www.veritext.com/remote](http://www.veritext.com/remote) for additional remote deposition information.

The deposition will be taken, via remote means, before an officer authorized to administer the oath to the Deponent. If the deposition is not completed on the above date, the deposition will continue from day to day, weekends and holiday excluded, until completed. Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, PennyMac reserves the right to record the deposition by audio or audiovisual means in addition to the stenographic method. PennyMac further reserves the right to utilize software to generate the instant visual display of testimony. Further, PennyMac reserves the right to conduct this deposition utilizing the secure web-based deposition option afforded by Veritext or in the alternative video conferencing (VTC) services or telephonically to provide remote/virtual access for those parties wishing to participate in the deposition via the internet and/or telephone. Take note that the deposition officer may also be remote and out of the presence of the deponent via one of the options above for the

purposes of providing the oath/affirmation to the deponent and capturing the proceeding. We further reserve the right to utilize the following: (1) Exhibit Capture (picture-in-picture) technology in which any exhibit reviewed by the deponent during the deposition can be captured visually; and (2) To conduct this deposition utilizing a paperless exhibit display process called Exhibit Share or a similar paperless virtual display platform. The parties are advised that in lieu of a paper set of exhibits they may be provided and displayed digitally to the deposition officer, deponent, parties and counsel. The exhibits will be compiled by the deposition officer for the purposes of exhibit stamping, and ultimate production of the final certified transcript.

Please contact the noticing attorney at least three (3) calendar days prior to the deposition to advise that it is your desire to appear via these remote participating means so that the necessary credentials, call-in numbers, email address, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding(s).

Dated: November 11, 2020

Respectfully submitted,

/s/ Nicole Bartz Metral

Cheryl S. Chang (admitted *pro hac vice*)

Nicole Bartz Metral (admitted *pro hac vice*)

Jessica A. McElroy (admitted *pro hac vice*)

BLANK ROME LLP

2029 Century Park East, 6th Floor

Los Angeles, California 90067-2907

Telephone: 424.239.3400

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Fax No. 662-453-9245  
hpowers@upshawwilliams.com  
scookston@upshawwilliams.com

*Counsel for Plaintiff*

## EXHIBIT A

1. Physical Presence Prohibited. The witness will be made available for deposition by video, with no attendees physically in the presence of the deponent. Witnesses may not use any communication devices other than those to facilitate the deposition during questioning and may not consult in any fashion with anyone other than with representing counsel during questioning. Witnesses may not privately confer with counsel at all during questioning except as to questions of privilege.

2. Participant List. At least three calendar days prior to the noticed deposition date, each individual planning to participate in the deposition must notify the party noticing the deposition of his/her intent to participate and provide the following information to the noticing party: (a) name, (b) email address, (c) phone number. The noticing party will share this information with the vendor arranging the deposition for the limited purpose of facilitating each participating party's access to the video web portal for the deposition.

3. Technology Requirements. All video depositions will be stenographically recorded by a court reporter with real-time feed capabilities. Each individual participating in a deposition conducted by video must have a webcam-equipped device (such as a desktop, laptop, or tablet), and a device with audio-capabilities or access to a telephone for calling into the deposition. Other than this equipment, the witness shall not be permitted to have access to any other devices (such as a cellphone) while on the record.

Noticing counsel are not responsible for the quality or functionality of the video and audio stream for the witness, observers, or other participants. Attendees agree to work in good faith to facilitate remote participation.

4. Identification of Individuals in Attendance. Each witness, attorney, and other person attending the deposition shall be identified on the record at the commencement of the deposition. Under no circumstances may a person attend the deposition remotely in any manner without identifying themselves on the record at the commencement of the deposition.

5. Conduct by Participants Appearing Remotely. Each individual participating in the deposition (including counsel for the deponent) must do so remotely and must have an active video stream and audio line for the duration of the deposition. Each participant should attend from a quiet, private location.



6. Deponent Communication During a Video Deposition. During the deposition, Deponent shall not communicate with anyone at all outside of the video/audio stream. This includes, but is not limited to, instant messaging, text messaging, or any equivalent. In the event any such communications occur, the parties agree that the communications are discoverable.

7. Disruptions. In the event a participant's video feed is interrupted or otherwise becomes hidden from view, the deposition will be suspended, and the parties will go back on the record only when the participant's video stream functionality has been restored. Disruptions due to video streaming, phone line interruptions, or other technical problems shall not be counted against record time. If a party believes that the transmission and/or recording was disrupted in bad faith, including but not limited to for purposes of delay, it may request that an additional videographer record other participants and may seek further appropriate relief from the Court.

8. Court Reporter and Videographer. The parties will stipulate, in accordance with Federal Rule of Civil Procedure 30(b)(5), that the court reporter or videographer may participate in the deposition by remote means, and that the deposition will be deemed to have been conducted "before" that officer, even though the officer is not physically present with the deponent, so long as that officer is able to identify the deponent.

9. Official Record. The court reporter's transcript, and the videographer's recording (if any), shall constitute the official record of the deposition for all purposes.

10. Other Recording. No participant other than the court reporter and videographer (if any) may record or photograph any of the proceedings. This shall include recording using any form of remote transmitting device, computer recording device, laptops, camera, and personal device, including smart phones, tablets, iPads, Androids, iPhones, Blackberries, or other PDAs. Nothing in this provision prevents or limits the taking of notes by those identified on the record.

11. Use of Remote Depositions at Trial. Remote depositions conducted in accordance with this Protocol may be admitted at trial with the same effect as a deposition conducted in person.

12. Instant Visual Display Technology. In the event the noticing party utilizes instant visual display technology such that the court reporter's writing of

the proceeding will be displayed in real-time, the witness shall not have access to the instant visual display.

13. Applicable Authority. Unless otherwise set forth herein, the Federal Rules of Civil Procedure, Federal Rules of Evidence, and other applicable authority shall govern as though the deposition was conducted in-person.

14. Duration. Nothing herein prevents a noticing party from conducting an in-person deposition once COVID-19 related preventative measures are lifted in the states where the parties and counsel reside. If, however, a noticing party elects to conduct a deposition by remote means even after such measures are lifted, the terms of this Protocol shall continue to govern.

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is **BLANK ROME LLP**, 2029 Century Park East, 6<sup>th</sup> Floor, Los Angeles, California 90067.

On **November 11, 2020**, I served the foregoing document(s):

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF  
DEPOSITION OF DEFENDANT SANDRA GOULETTE PURSUANT TO  
FED. R. CIV. P. 26 AND 30**

**on the interested parties in this action addressed and sent as follows:**

**SEE ATTACHED SERVICE LIST**

- ☒ **BY ENVELOPE:** by placing ☐ the original ☒ a true copy thereof enclosed in sealed envelope(s) addressed as indicated and delivering such envelope(s):
- ☒ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office or home of the addressee(s) as indicated. I am "readily familiar" with this firm's practice of collection and processing documents for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☒ **BY FEDEX:** I caused such envelope(s) to be deposited in a box or other facility regularly maintained by FedEx, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents in an envelope designated by the said express service carrier, addressed as indicated, with delivery fees paid or provided for, to be transmitted by FedEx.

☒ **FEDERAL:** I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.

Executed on **November 11, 2020** at Los Angeles, California.

/s/Charman S. Bee

Charman S. Bee

**SERVICE LIST**

*Pennymac Loan Services, LLC v. Sitcomm Arbitration Association, et al.*;  
Case No. 2:19-cv-00193-KS-MTP

**BY U.S. MAIL**

Ronnie Kahapea

Defendant

P.O. Box 875

Volcano, HI 96785

**BY FED EX**

Mark Johnson

Defendant

451 May Lane

Louisa, VA 23093

**BY FED EX**

Kirk Gibbs

Defendant

3115 Lawrenceville Rd.

PMB 8119

Lilburn, GA 30047

**BY FED EX**

Sandra Goulette

Defendant

3007 Crescent Hill Drive

Laurel, MS 39440

**BY FED EX**

Mark Moffett

Defendant

345 Coon Jeffcoat Road

Soso, MS 39480

398819597276

Delivered  
Thursday 11/12/2020 at 1:59 pm

**DELIVERED**

Signature not required

[GET STATUS UPDATES](#)

[OBTAIN PROOF OF DELIVERY](#)

**FROM**

Los Angeles, CA US

**TO**

LAUREL, MS US

**Shipment Facts**

**TRACKING NUMBER**

398819597276

**SERVICE**

FedEx Priority Overnight

**WEIGHT**

0.5 lbs / 0.23 kgs

**DELIVERED TO**

Residence

**TOTAL PIECES**

1

**TOTAL SHIPMENT WEIGHT**

0.5 lbs / 0.23 kgs

**TERMS**

Shipper

**SHIPPER REFERENCE**

136044.01923-04319

**PACKAGING**

FedEx Envelope

**SPECIAL HANDLING SECTION**

Deliver Weekday, Residential Delivery,  
No Signature Required

**STANDARD TRANSIT**

11/12/2020 by 12:00 pm

**SHIP DATE**

Wed 11/11/2020

**ACTUAL DELIVERY**

Thu 11/12/2020 1:59 pm

**Travel History**

[Local Scan Time](#)

Thursday, 11/12/2020

|         |                 |   |
|---------|-----------------|---|
| 1:59 pm | Laurel, MS      | Delivered   |
|         |                 | Left at garage. Package delivered to recipient address - release authorized |
| 9:09 am | HATTIESBURG, MS | On FedEx vehicle for delivery   |
| 8:18 am | HATTIESBURG, MS | At local FedEx facility   |
| 4:33 am | KENNER, LA      | At destination sort facility  |
| 3:41 am | MEMPHIS, TN     | Departed FedEx location   |

|                       |                    |                                    |
|-----------------------|--------------------|------------------------------------|
| 12:45 am              | MEMPHIS, TN        | Arrived at FedEx location          |
| Wednesday, 11/11/2020 |                    |                                    |
| 6:11 pm               | MARINA DEL REY, CA | Left FedEx origin facility         |
| 4:18 pm               | MARINA DEL REY, CA | Picked up                          |
| 2:53 pm               |                    | Shipment information sent to FedEx |

## BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

**Phone:** (424) 239-3483

**Fax:** (424) 239-3845

**Email:** nbmetral@blankrome.com

November 17, 2020

### **TO DEFENDANTS**

SEE CERTIFICATE OF SERVICE AND SERVICE LIST

Re: *PennyMac Loan Services, LLC v. Sitcomm Arbitration Association, et al.*  
Case No. 2:19-cv-00193-KS-MTP (Southern District of Mississippi)

Dear Defendants:

As you know, Blank Rome LLP and Upshaw, Williams, Biggers & Beckham, LLP represent plaintiff PennyMac Loan Services, LLC ("PennyMac") in the above-referenced matter.

We wanted to provide each of you with the enclosed five notices of deposition for Mark Johnson, Ronnie Kahapea, Kirk Gibbs, Sandra Goulette, and Mark Moffett. Each of these deposition notices were previously served to the corresponding deponent on November 11, 2020. We also wanted you to be aware that each of you may attend the other depositions. The deposition schedule is as follows:

- November 24, 2020 at 11:00 a.m. Central Time - Mark Johnson
- November 30, 2020 at 1:00 p.m. Central Time – Ronnie Kahapea
- December 4, 2020 at 11:00 a.m. Central Time – Kirk Gibbs
- December 7, 2020 at 11:00 a.m. Central Time – Sandra Goulette
- December 9, 2020 at 11:00 a.m. Central Time - Mark Moffett

As stated in each of the notices of deposition, the depositions will take place remotely by video conference. Please contact Veritext's calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition. Please also contact my office at least three (3) calendar days prior to the deposition to advise that it is your desire to appear via these remote participating means so that the necessary credentials, call-in numbers, email address, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding(s). The following webpage - [www.veritext.com/remote](http://www.veritext.com/remote) may also be accessed for additional remote deposition information.



BLANKROME

ALL DEFENDANTS

November 17, 2020

Page 2

Please feel free to contact the undersigned if you have any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Metral', written in a cursive style.

Nicole B. Metral

NBM

Enclosures (Five Notices of Deposition)

cc: Harris Powers, Esq. (e-mail only)  
Steven Cookston, Esq. (e-mail only)  
Cheryl Chang, Esq. (e-mail only)  
Jessica McElroy (e-mail only)

**CERTIFICATE OF SERVICE**

I, Nicole B. Metral, hereby certify that I have this day caused to be served true and correct copies of the following: (1) LETTER DATED NOVEMBER 17, 2020; (2) PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF DEPOSITION OF DEFENDANT MARK JOHNSON PURSUANT TO FED. R. CIV. P. 26 AND 30; (3) PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF DEPOSITION OF DEFENDANT RONNIE KAHAPEA PURSUANT TO FED. R. CIV. P. 26 AND 30; (4) PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF DEPOSITION OF DEFENDANT KIRK GIBBS PURSUANT TO FED. R. CIV. P. 26 AND 30; (5) PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF DEPOSITION OF DEFENDANT SANDRA GOULETTE PURSUANT TO FED. R. CIV. P. 26 AND 30; AND (6) PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF DEPOSITION OF DEFENDANT MARK MOFFETT PURSUANT TO FED. R. CIV. P. 26 AND 30 **via Federal Express** to:

Mark Johnson  
451 May Lane  
Louisa, VA 23093  
Defendant  
Federal Express Tracking No. 3990 5981 2115

Kirk Gibbs  
4155 Lawrenceville Rd.  
PMB 8119  
Lilburn, GA 30047  
Defendant  
Federal Express Tracking No. 3990 6012 3963

Kirk Gibbs  
525 Arlington Circle NW  
Lenoir, NC 28645  
Defendant  
Federal Express Tracking No. 3990 6030 0913

BLANKROME

ALL DEFENDANTS

November 17, 2020

Page 4

Sandra Goulette

3007 Crescent Hill Drive

Laurel, MS 39440

Defendant

Federal Express Tracking No. 3990 6063 5879

Mark Moffett

345 Coon Jefcoat Road

Soso, MS 39480

Defendant

Federal Express Tracking No. 3990 6076 6984

And **via United States Postal Service Priority Mail** to:

Ronnie Kahapea

P.O. Box 875

Volcano, HI 96785

Defendant

United States Postal Service Priority Mail Tracking No. 9114902307224670949779

SO CERTIFIED this the 17th day of November, 2020.

/s/ Nicole B. Metral  
NICOLE B. METRAL

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**Eastern Division**

PENNYMAC LOAN SERVICES, LLC,  
  
Plaintiff,

CIVIL ACTION  
**Case No: 2:19-cv-00193-KS-MTP**

-VS-

SITCOMM ARBITRATION  
ASSOCIATION, MARK MOFFETT,  
SANDRA GOULETTE, RONNIE  
KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT,

Defendants.

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF  
DEPOSITION OF DEFENDANT MARK JOHNSON PURSUANT TO FED.  
R. CIV. P. 26 AND 30**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

DEPONENT: MARK JOHNSON

DATE: November 24, 2020

TIME: 11:00 a.m. Central Standard Time

LOCATION: Remote by videoconference. See Exhibit A. Contact Veritext's calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition.

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, plaintiff PennyMac Loan Services, LLC (“PennyMac”) will take the deposition by oral examination of defendant Mark Johnson (“Deponent”) on November 24, 2020 at 11:00 a.m. Central Standard Time via remote video conference pursuant to Exhibit A.

The remote deposition will be coordinated by Veritext Legal Solutions, with a business address of 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017. Contact Veritext’s calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition, as well as information related to any technical assistance you may require to assist with carrying out the virtual deposition. We encourage you to access [www.veritext.com/remote](http://www.veritext.com/remote) for additional remote deposition information.

The deposition will be taken, via remote means, before an officer authorized to administer the oath to the Deponent. If the deposition is not completed on the above date, the deposition will continue from day to day, weekends and holiday excluded, until completed. Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, PennyMac reserves the right to record the deposition by audio or audiovisual means in addition to the stenographic method. PennyMac further reserves the right to utilize software to generate the instant visual display of testimony. Further, PennyMac reserves the right to conduct this deposition utilizing the secure web-based deposition option afforded by Veritext or in the alternative video teleconferencing (VTC) services or telephonically to provide remote/virtual access for those parties wishing to participate in the deposition via the internet and/or telephone. Take note that the deposition officer may also be remote and out of the presence of the deponent via one of the options above for the

purposes of providing the oath/affirmation to the deponent and capturing the proceeding. We further reserve the right to utilize the following: (1) Exhibit Capture (picture-in-picture) technology in which any exhibit reviewed by the deponent during the deposition can be captured visually; and (2) To conduct this deposition utilizing a paperless exhibit display process called Exhibit Share or a similar paperless virtual display platform. The parties are advised that in lieu of a paper set of exhibits they may be provided and displayed digitally to the deposition officer, deponent, parties and counsel. The exhibits will be compiled by the deposition officer for the purposes of exhibit stamping, and ultimate production of the final certified transcript.

Please contact the noticing attorney at least three (3) calendar days prior to the deposition to advise that it is your desire to appear via these remote participating means so that the necessary credentials, call-in numbers, email address, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding(s).

Dated: November 11, 2020

Respectfully submitted,

/s/ Nicole Bartz Metral

Cheryl S. Chang (admitted *pro hac vice*)

Nicole Bartz Metral (admitted *pro hac vice*)

Jessica A. McElroy (admitted *pro hac vice*)

BLANK ROME LLP

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Telephone No.: 662-455-1613  
Fax No. 662-453-9245  
hpowers@upshawwilliams.com  
scookston@upshawwilliams.com

*Counsel for Plaintiff*

## EXHIBIT A

1. Physical Presence Prohibited. The witness will be made available for deposition by video, with no attendees physically in the presence of the deponent. Witnesses may not use any communication devices other than those to facilitate the deposition during questioning and may not consult in any fashion with anyone other than with representing counsel during questioning. Witnesses may not privately confer with counsel at all during questioning except as to questions of privilege.

2. Participant List. At least three calendar days prior to the noticed deposition date, each individual planning to participate in the deposition must notify the party noticing the deposition of his/her intent to participate and provide the following information to the noticing party: (a) name, (b) email address, (c) phone number. The noticing party will share this information with the vendor arranging the deposition for the limited purpose of facilitating each participating party's access to the video web portal for the deposition.

3. Technology Requirements. All video depositions will be stenographically recorded by a court reporter with real-time feed capabilities. Each individual participating in a deposition conducted by video must have a webcam-equipped device (such as a desktop, laptop, or tablet), and a device with audio-capabilities or access to a telephone for calling into the deposition. Other than this equipment, the witness shall not be permitted to have access to any other devices (such as a cellphone) while on the record.

Noticing counsel are not responsible for the quality or functionality of the video and audio stream for the witness, observers, or other participants. Attendees agree to work in good faith to facilitate remote participation.

4. Identification of Individuals in Attendance. Each witness, attorney, and other person attending the deposition shall be identified on the record at the commencement of the deposition. Under no circumstances may a person attend the deposition remotely in any manner without identifying themselves on the record at the commencement of the deposition.

5. Conduct by Participants Appearing Remotely. Each individual participating in the deposition (including counsel for the deponent) must do so remotely and must have an active video stream and audio line for the duration of the deposition. Each participant should attend from a quiet, private location.



6. Deponent Communication During a Video Deposition. During the deposition, Deponent shall not communicate with anyone at all outside of the video/audio stream. This includes, but is not limited to, instant messaging, text messaging, or any equivalent. In the event any such communications occur, the parties agree that the communications are discoverable.

7. Disruptions. In the event a participant's video feed is interrupted or otherwise becomes hidden from view, the deposition will be suspended, and the parties will go back on the record only when the participant's video stream functionality has been restored. Disruptions due to video streaming, phone line interruptions, or other technical problems shall not be counted against record time. If a party believes that the transmission and/or recording was disrupted in bad faith, including but not limited to for purposes of delay, it may request that an additional videographer record other participants and may seek further appropriate relief from the Court.

8. Court Reporter and Videographer. The parties will stipulate, in accordance with Federal Rule of Civil Procedure 30(b)(5), that the court reporter or videographer may participate in the deposition by remote means, and that the deposition will be deemed to have been conducted "before" that officer, even though the officer is not physically present with the deponent, so long as that officer is able to identify the deponent.

9. Official Record. The court reporter's transcript, and the videographer's recording (if any), shall constitute the official record of the deposition for all purposes.

10. Other Recording. No participant other than the court reporter and videographer (if any) may record or photograph any of the proceedings. This shall include recording using any form of remote transmitting device, computer recording device, laptops, camera, and personal device, including smart phones, tablets, iPads, Androids, iPhones, Blackberries, or other PDAs. Nothing in this provision prevents or limits the taking of notes by those identified on the record.

11. Use of Remote Depositions at Trial. Remote depositions conducted in accordance with this Protocol may be admitted at trial with the same effect as a deposition conducted in person.

12. Instant Visual Display Technology. In the event the noticing party utilizes instant visual display technology such that the court reporter's writing of

the proceeding will be displayed in real-time, the witness shall not have access to the instant visual display.

13. Applicable Authority. Unless otherwise set forth herein, the Federal Rules of Civil Procedure, Federal Rules of Evidence, and other applicable authority shall govern as though the deposition was conducted in-person.

14. Duration. Nothing herein prevents a noticing party from conducting an in-person deposition once COVID-19 related preventative measures are lifted in the states where the parties and counsel reside. If, however, a noticing party elects to conduct a deposition by remote means even after such measures are lifted, the terms of this Protocol shall continue to govern.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**Eastern Division**

PENNYMAC LOAN SERVICES, LLC,

CIVIL ACTION

**Case No: 2:19-cv-00193-KS-MTP**

Plaintiff,

-VS-

SITCOMM ARBITRATION  
ASSOCIATION, MARK MOFFETT,  
SANDRA GOULETTE, RONNIE  
KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT,

Defendants.

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF  
DEPOSITION OF DEFENDANT RONNIE KAHAPEA PURSUANT TO  
FED. R. CIV. P. 26 AND 30**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

DEPONENT: RONNIE KAHAPEA

DATE: November 30, 2020

TIME: 1:00 p.m. Central Standard Time

LOCATION: Remote by videoconference. See Exhibit A. Contact Veritext's calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition.

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, plaintiff PennyMac Loan Services, LLC (“PennyMac”) will take the deposition by oral examination of defendant Ronnie Kahapea (“Deponent”) on November 30, 2020 at 1:00 p.m. Central Standard Time via remote video conference pursuant to Exhibit A.

The remote deposition will be coordinated by Veritext Legal Solutions, with a business address of 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017. Contact Veritext’s calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition, as well as information related to any technical assistance you may require to assist with carrying out the virtual deposition. We encourage you to access [www.veritext.com/remote](http://www.veritext.com/remote) for additional remote deposition information.

The deposition will be taken, via remote means, before an officer authorized to administer the oath to the Deponent. If the deposition is not completed on the above date, the deposition will continue from day to day, weekends and holiday excluded, until completed. Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, PennyMac reserves the right to record the deposition by audio or audiovisual means in addition to the stenographic method. PennyMac further reserves the right to utilize software to generate the instant visual display of testimony. Further, PennyMac reserves the right to conduct this deposition utilizing the secure web-based deposition option afforded by Veritext or in the alternative video teleconferencing (VTC) services or telephonically to provide remote/virtual access for those parties wishing to participate in the deposition via the internet and/or telephone. Take note that the deposition officer may also be remote and out of the presence of the deponent via one of the options above for the

purposes of providing the oath/affirmation to the deponent and capturing the proceeding. We further reserve the right to utilize the following: (1) Exhibit Capture (picture-in-picture) technology in which any exhibit reviewed by the deponent during the deposition can be captured visually; and (2) To conduct this deposition utilizing a paperless exhibit display process called Exhibit Share or a similar paperless virtual display platform. The parties are advised that in lieu of a paper set of exhibits they may be provided and displayed digitally to the deposition officer, deponent, parties and counsel. The exhibits will be compiled by the deposition officer for the purposes of exhibit stamping, and ultimate production of the final certified transcript.

Please contact the noticing attorney at least three (3) calendar days prior to the deposition to advise that it is your desire to appear via these remote participating means so that the necessary credentials, call-in numbers, email address, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding(s).

Dated: November 11, 2020

Respectfully submitted,

/s/ Nicole Bartz Metral

Cheryl S. Chang (admitted *pro hac vice*)

Nicole Bartz Metral (admitted *pro hac vice*)

Jessica A. McElroy (admitted *pro hac vice*)

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hpowers@upshawwilliams.com  
scookston@upshawwilliams.com

*Counsel for Plaintiff*

## EXHIBIT A

1. Physical Presence Prohibited. The witness will be made available for deposition by video, with no attendees physically in the presence of the deponent. Witnesses may not use any communication devices other than those to facilitate the deposition during questioning and may not consult in any fashion with anyone other than with representing counsel during questioning. Witnesses may not privately confer with counsel at all during questioning except as to questions of privilege.

2. Participant List. At least three calendar days prior to the noticed deposition date, each individual planning to participate in the deposition must notify the party noticing the deposition of his/her intent to participate and provide the following information to the noticing party: (a) name, (b) email address, (c) phone number. The noticing party will share this information with the vendor arranging the deposition for the limited purpose of facilitating each participating party's access to the video web portal for the deposition.

3. Technology Requirements. All video depositions will be stenographically recorded by a court reporter with real-time feed capabilities. Each individual participating in a deposition conducted by video must have a webcam-equipped device (such as a desktop, laptop, or tablet), and a device with audio-capabilities or access to a telephone for calling into the deposition. Other than this equipment, the witness shall not be permitted to have access to any other devices (such as a cellphone) while on the record.

Noticing counsel are not responsible for the quality or functionality of the video and audio stream for the witness, observers, or other participants. Attendees agree to work in good faith to facilitate remote participation.

4. Identification of Individuals in Attendance. Each witness, attorney, and other person attending the deposition shall be identified on the record at the commencement of the deposition. Under no circumstances may a person attend the deposition remotely in any manner without identifying themselves on the record at the commencement of the deposition.

5. Conduct by Participants Appearing Remotely. Each individual participating in the deposition (including counsel for the deponent) must do so remotely and must have an active video stream and audio line for the duration of the deposition. Each participant should attend from a quiet, private location.

6. Deponent Communication During a Video Deposition. During the deposition, Deponent shall not communicate with anyone at all outside of the video/audio stream. This includes, but is not limited to, instant messaging, text messaging, or any equivalent. In the event any such communications occur, the parties agree that the communications are discoverable.

7. Disruptions. In the event a participant's video feed is interrupted or otherwise becomes hidden from view, the deposition will be suspended, and the parties will go back on the record only when the participant's video stream functionality has been restored. Disruptions due to video streaming, phone line interruptions, or other technical problems shall not be counted against record time. If a party believes that the transmission and/or recording was disrupted in bad faith, including but not limited to for purposes of delay, it may request that an additional videographer record other participants and may seek further appropriate relief from the Court.

8. Court Reporter and Videographer. The parties will stipulate, in accordance with Federal Rule of Civil Procedure 30(b)(5), that the court reporter or videographer may participate in the deposition by remote means, and that the deposition will be deemed to have been conducted "before" that officer, even though the officer is not physically present with the deponent, so long as that officer is able to identify the deponent.

9. Official Record. The court reporter's transcript, and the videographer's recording (if any), shall constitute the official record of the deposition for all purposes.

10. Other Recording. No participant other than the court reporter and videographer (if any) may record or photograph any of the proceedings. This shall include recording using any form of remote transmitting device, computer recording device, laptops, camera, and personal device, including smart phones, tablets, iPads, Androids, iPhones, Blackberries, or other PDAs. Nothing in this provision prevents or limits the taking of notes by those identified on the record.

11. Use of Remote Depositions at Trial. Remote depositions conducted in accordance with this Protocol may be admitted at trial with the same effect as a deposition conducted in person.

12. Instant Visual Display Technology. In the event the noticing party utilizes instant visual display technology such that the court reporter's writing of



the proceeding will be displayed in real-time, the witness shall not have access to the instant visual display.

13. Applicable Authority. Unless otherwise set forth herein, the Federal Rules of Civil Procedure, Federal Rules of Evidence, and other applicable authority shall govern as though the deposition was conducted in-person.

14. Duration. Nothing herein prevents a noticing party from conducting an in-person deposition once COVID-19 related preventative measures are lifted in the states where the parties and counsel reside. If, however, a noticing party elects to conduct a deposition by remote means even after such measures are lifted, the terms of this Protocol shall continue to govern.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**Eastern Division**

PENNYMAC LOAN SERVICES, LLC,

CIVIL ACTION

**Case No: 2:19-cv-00193-KS-MTP**

Plaintiff,

-VS-

SITCOMM ARBITRATION  
ASSOCIATION, MARK MOFFETT,  
SANDRA GOULETTE, RONNIE  
KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT,

Defendants.

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF  
DEPOSITION OF DEFENDANT KIRK GIBBS PURSUANT TO FED. R.  
CIV. P. 26 AND 30**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

DEPONENT: KIRK GIBBS

DATE: December 4, 2020

TIME: 11:00 a.m. Central Standard Time

LOCATION: Remote by videoconference. See Exhibit A. Contact Veritext's calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition.

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, plaintiff PennyMac Loan Services, LLC (“PennyMac”) will take the deposition by oral examination of defendant Kirk Gibbs (“Deponent”) on December 4, 2020 at 11:00 a.m. Central Standard Time via remote video conference pursuant to Exhibit A.

The remote deposition will be coordinated by Veritext Legal Solutions, with a business address of 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017. Contact Veritext’s calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition, as well as information related to any technical assistance you may require to assist with carrying out the virtual deposition. We encourage you to access [www.veritext.com/remote](http://www.veritext.com/remote) for additional remote deposition information.

The deposition will be taken, via remote means, before an officer authorized to administer the oath to the Deponent. If the deposition is not completed on the above date, the deposition will continue from day to day, weekends and holiday excluded, until completed. Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, PennyMac reserves the right to record the deposition by audio or audiovisual means in addition to the stenographic method. PennyMac further reserves the right to utilize software to generate the instant visual display of testimony. Further, PennyMac reserves the right to conduct this deposition utilizing the secure web-based deposition option afforded by Veritext or in the alternative video conferencing (VTC) services or telephonically to provide remote/virtual access for those parties wishing to participate in the deposition via the internet and/or telephone. Take note that the deposition officer may also be remote and out of the presence of the deponent via one of the options above for the

purposes of providing the oath/affirmation to the deponent and capturing the proceeding. We further reserve the right to utilize the following: (1) Exhibit Capture (picture-in-picture) technology in which any exhibit reviewed by the deponent during the deposition can be captured visually; and (2) To conduct this deposition utilizing a paperless exhibit display process called Exhibit Share or a similar paperless virtual display platform. The parties are advised that in lieu of a paper set of exhibits they may be provided and displayed digitally to the deposition officer, deponent, parties and counsel. The exhibits will be compiled by the deposition officer for the purposes of exhibit stamping, and ultimate production of the final certified transcript.

Please contact the noticing attorney at least three (3) calendar days prior to the deposition to advise that it is your desire to appear via these remote participating means so that the necessary credentials, call-in numbers, email address, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding(s).

Dated: November 11, 2020

Respectfully submitted,

/s/ Nicole Bartz Metral

Cheryl S. Chang (admitted *pro hac vice*)

Nicole Bartz Metral (admitted *pro hac vice*)

Jessica A. McElroy (admitted *pro hac vice*)

BLANK ROME LLP

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hpowers@upshawwilliams.com  
scookston@upshawwilliams.com

*Counsel for Plaintiff*

## EXHIBIT A

1. Physical Presence Prohibited. The witness will be made available for deposition by video, with no attendees physically in the presence of the deponent. Witnesses may not use any communication devices other than those to facilitate the deposition during questioning and may not consult in any fashion with anyone other than with representing counsel during questioning. Witnesses may not privately confer with counsel at all during questioning except as to questions of privilege.

2. Participant List. At least three calendar days prior to the noticed deposition date, each individual planning to participate in the deposition must notify the party noticing the deposition of his/her intent to participate and provide the following information to the noticing party: (a) name, (b) email address, (c) phone number. The noticing party will share this information with the vendor arranging the deposition for the limited purpose of facilitating each participating party's access to the video web portal for the deposition.

3. Technology Requirements. All video depositions will be stenographically recorded by a court reporter with real-time feed capabilities. Each individual participating in a deposition conducted by video must have a webcam-equipped device (such as a desktop, laptop, or tablet), and a device with audio-capabilities or access to a telephone for calling into the deposition. Other than this equipment, the witness shall not be permitted to have access to any other devices (such as a cellphone) while on the record.

Noticing counsel are not responsible for the quality or functionality of the video and audio stream for the witness, observers, or other participants. Attendees agree to work in good faith to facilitate remote participation.

4. Identification of Individuals in Attendance. Each witness, attorney, and other person attending the deposition shall be identified on the record at the commencement of the deposition. Under no circumstances may a person attend the deposition remotely in any manner without identifying themselves on the record at the commencement of the deposition.

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6. Deponent Communication During a Video Deposition. During the deposition, Deponent shall not communicate with anyone at all outside of the video/audio stream. This includes, but is not limited to, instant messaging, text messaging, or any equivalent. In the event any such communications occur, the parties agree that the communications are discoverable.

7. Disruptions. In the event a participant's video feed is interrupted or otherwise becomes hidden from view, the deposition will be suspended, and the parties will go back on the record only when the participant's video stream functionality has been restored. Disruptions due to video streaming, phone line interruptions, or other technical problems shall not be counted against record time. If a party believes that the transmission and/or recording was disrupted in bad faith, including but not limited to for purposes of delay, it may request that an additional videographer record other participants and may seek further appropriate relief from the Court.

8. Court Reporter and Videographer. The parties will stipulate, in accordance with Federal Rule of Civil Procedure 30(b)(5), that the court reporter or videographer may participate in the deposition by remote means, and that the deposition will be deemed to have been conducted "before" that officer, even though the officer is not physically present with the deponent, so long as that officer is able to identify the deponent.

9. Official Record. The court reporter's transcript, and the videographer's recording (if any), shall constitute the official record of the deposition for all purposes.

10. Other Recording. No participant other than the court reporter and videographer (if any) may record or photograph any of the proceedings. This shall include recording using any form of remote transmitting device, computer recording device, laptops, camera, and personal device, including smart phones, tablets, iPads, Androids, iPhones, Blackberries, or other PDAs. Nothing in this provision prevents or limits the taking of notes by those identified on the record.

11. Use of Remote Depositions at Trial. Remote depositions conducted in accordance with this Protocol may be admitted at trial with the same effect as a deposition conducted in person.

12. Instant Visual Display Technology. In the event the noticing party utilizes instant visual display technology such that the court reporter's writing of

the proceeding will be displayed in real-time, the witness shall not have access to the instant visual display.

13. Applicable Authority. Unless otherwise set forth herein, the Federal Rules of Civil Procedure, Federal Rules of Evidence, and other applicable authority shall govern as though the deposition was conducted in-person.

14. Duration. Nothing herein prevents a noticing party from conducting an in-person deposition once COVID-19 related preventative measures are lifted in the states where the parties and counsel reside. If, however, a noticing party elects to conduct a deposition by remote means even after such measures are lifted, the terms of this Protocol shall continue to govern.



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**Eastern Division**

PENNYMAC LOAN SERVICES, LLC,

CIVIL ACTION

**Case No: 2:19-cv-00193-KS-MTP**

Plaintiff,

-VS-

SITCOMM ARBITRATION  
ASSOCIATION, MARK MOFFETT,  
SANDRA GOULETTE, RONNIE  
KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT,

Defendants.

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF  
DEPOSITION OF DEFENDANT SANDRA GOULETTE PURSUANT TO  
FED. R. CIV. P. 26 AND 30**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

DEPONENT: SANDRA GOULETTE

DATE: December 7, 2020

TIME: 11:00 a.m. Central Standard Time

LOCATION: Remote by videoconference. See Exhibit A. Contact Veritext's calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition.

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, plaintiff PennyMac Loan Services, LLC (“PennyMac”) will take the deposition by oral examination of defendant Sandra Goulette (“Deponent”) on December 7, 2020 at 11:00 a.m. Central Standard Time via remote video conference pursuant to Exhibit A.

The remote deposition will be coordinated by Veritext Legal Solutions, with a business address of 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017. Contact Veritext’s calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition, as well as information related to any technical assistance you may require to assist with carrying out the virtual deposition. We encourage you to access [www.veritext.com/remote](http://www.veritext.com/remote) for additional remote deposition information.

The deposition will be taken, via remote means, before an officer authorized to administer the oath to the Deponent. If the deposition is not completed on the above date, the deposition will continue from day to day, weekends and holiday excluded, until completed. Pursuant to Rule 30(b)(3)(A) of the Federal Rules of Civil Procedure, PennyMac reserves the right to record the deposition by audio or audiovisual means in addition to the stenographic method. PennyMac further reserves the right to utilize software to generate the instant visual display of testimony. Further, PennyMac reserves the right to conduct this deposition utilizing the secure web-based deposition option afforded by Veritext or in the alternative video conferencing (VTC) services or telephonically to provide remote/virtual access for those parties wishing to participate in the deposition via the internet and/or telephone. Take note that the deposition officer may also be remote and out of the presence of the deponent via one of the options above for the

purposes of providing the oath/affirmation to the deponent and capturing the proceeding. We further reserve the right to utilize the following: (1) Exhibit Capture (picture-in-picture) technology in which any exhibit reviewed by the deponent during the deposition can be captured visually; and (2) To conduct this deposition utilizing a paperless exhibit display process called Exhibit Share or a similar paperless virtual display platform. The parties are advised that in lieu of a paper set of exhibits they may be provided and displayed digitally to the deposition officer, deponent, parties and counsel. The exhibits will be compiled by the deposition officer for the purposes of exhibit stamping, and ultimate production of the final certified transcript.

Please contact the noticing attorney at least three (3) calendar days prior to the deposition to advise that it is your desire to appear via these remote participating means so that the necessary credentials, call-in numbers, email address, services, testing and information, if necessary, can be arranged and provided to you prior to the proceeding(s).

Dated: November 11, 2020

Respectfully submitted,

/s/ Nicole Bartz Metral

Cheryl S. Chang (admitted *pro hac vice*)

Nicole Bartz Metral (admitted *pro hac vice*)

Jessica A. McElroy (admitted *pro hac vice*)

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Fax No. 662-453-9245  
hpowers@upshawwilliams.com  
scookston@upshawwilliams.com

*Counsel for Plaintiff*

## EXHIBIT A

1. Physical Presence Prohibited. The witness will be made available for deposition by video, with no attendees physically in the presence of the deponent. Witnesses may not use any communication devices other than those to facilitate the deposition during questioning and may not consult in any fashion with anyone other than with representing counsel during questioning. Witnesses may not privately confer with counsel at all during questioning except as to questions of privilege.

2. Participant List. At least three calendar days prior to the noticed deposition date, each individual planning to participate in the deposition must notify the party noticing the deposition of his/her intent to participate and provide the following information to the noticing party: (a) name, (b) email address, (c) phone number. The noticing party will share this information with the vendor arranging the deposition for the limited purpose of facilitating each participating party's access to the video web portal for the deposition.

3. Technology Requirements. All video depositions will be stenographically recorded by a court reporter with real-time feed capabilities. Each individual participating in a deposition conducted by video must have a webcam-equipped device (such as a desktop, laptop, or tablet), and a device with audio-capabilities or access to a telephone for calling into the deposition. Other than this equipment, the witness shall not be permitted to have access to any other devices (such as a cellphone) while on the record.

Noticing counsel are not responsible for the quality or functionality of the video and audio stream for the witness, observers, or other participants. Attendees agree to work in good faith to facilitate remote participation.

4. Identification of Individuals in Attendance. Each witness, attorney, and other person attending the deposition shall be identified on the record at the commencement of the deposition. Under no circumstances may a person attend the deposition remotely in any manner without identifying themselves on the record at the commencement of the deposition.

5. Conduct by Participants Appearing Remotely. Each individual participating in the deposition (including counsel for the deponent) must do so remotely and must have an active video stream and audio line for the duration of the deposition. Each participant should attend from a quiet, private location.

6. Deponent Communication During a Video Deposition. During the deposition, Deponent shall not communicate with anyone at all outside of the video/audio stream. This includes, but is not limited to, instant messaging, text messaging, or any equivalent. In the event any such communications occur, the parties agree that the communications are discoverable.

7. Disruptions. In the event a participant's video feed is interrupted or otherwise becomes hidden from view, the deposition will be suspended, and the parties will go back on the record only when the participant's video stream functionality has been restored. Disruptions due to video streaming, phone line interruptions, or other technical problems shall not be counted against record time. If a party believes that the transmission and/or recording was disrupted in bad faith, including but not limited to for purposes of delay, it may request that an additional videographer record other participants and may seek further appropriate relief from the Court.

8. Court Reporter and Videographer. The parties will stipulate, in accordance with Federal Rule of Civil Procedure 30(b)(5), that the court reporter or videographer may participate in the deposition by remote means, and that the deposition will be deemed to have been conducted "before" that officer, even though the officer is not physically present with the deponent, so long as that officer is able to identify the deponent.

9. Official Record. The court reporter's transcript, and the videographer's recording (if any), shall constitute the official record of the deposition for all purposes.

10. Other Recording. No participant other than the court reporter and videographer (if any) may record or photograph any of the proceedings. This shall include recording using any form of remote transmitting device, computer recording device, laptops, camera, and personal device, including smart phones, tablets, iPads, Androids, iPhones, Blackberries, or other PDAs. Nothing in this provision prevents or limits the taking of notes by those identified on the record.

11. Use of Remote Depositions at Trial. Remote depositions conducted in accordance with this Protocol may be admitted at trial with the same effect as a deposition conducted in person.

12. Instant Visual Display Technology. In the event the noticing party utilizes instant visual display technology such that the court reporter's writing of

the proceeding will be displayed in real-time, the witness shall not have access to the instant visual display.

13. Applicable Authority. Unless otherwise set forth herein, the Federal Rules of Civil Procedure, Federal Rules of Evidence, and other applicable authority shall govern as though the deposition was conducted in-person.

14. Duration. Nothing herein prevents a noticing party from conducting an in-person deposition once COVID-19 related preventative measures are lifted in the states where the parties and counsel reside. If, however, a noticing party elects to conduct a deposition by remote means even after such measures are lifted, the terms of this Protocol shall continue to govern.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**Eastern Division**

PENNYMAC LOAN SERVICES, LLC,  
  
Plaintiff,

CIVIL ACTION  
**Case No: 2:19-cv-00193-KS-MTP**

-VS-

SITCOMM ARBITRATION  
ASSOCIATION, MARK MOFFETT,  
SANDRA GOULETTE, RONNIE  
KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT,

Defendants.

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S NOTICE OF  
DEPOSITION OF DEFENDANT MARK MOFFETT PURSUANT TO FED.  
R. CIV. P. 26 AND 30**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

DEPONENT: MARK MOFFETT

DATE: December 9, 2020

TIME: 11:00 a.m. Central Standard Time

LOCATION: Remote by videoconference. See Exhibit A. Contact Veritext's calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition.



**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, plaintiff PennyMac Loan Services, LLC (“PennyMac”) will take the deposition by oral examination of defendant Mark Moffett (“Deponent”) on December 9, 2020 at 11:00 a.m. Central Standard Time via remote video conference pursuant to Exhibit A.

The remote deposition will be coordinated by Veritext Legal Solutions, with a business address of 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017. Contact Veritext’s calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) to retrieve the necessary credentials to access the remote deposition, as well as information related to any technical assistance you may require to assist with carrying out the virtual deposition. We encourage you to access [www.veritext.com/remote](http://www.veritext.com/remote) for additional remote deposition information.

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Dated: November 11, 2020

Respectfully submitted,

/s/ Nicole Bartz Metral

Cheryl S. Chang (admitted *pro hac vice*)

Nicole Bartz Metral (admitted *pro hac vice*)

Jessica A. McElroy (admitted *pro hac vice*)

BLANK ROME LLP

2029 Century Park East, 6th Floor

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Fax No. 662-453-9245  
hpowers@upshawwilliams.com  
scookston@upshawwilliams.com

*Counsel for Plaintiff*

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**From:** TrackingUpdates@fedex.com  
**Sent:** Wednesday, November 18, 2020 8:22 AM  
**To:** Metral, Nicole  
**Subject:** FedEx Shipment 399060635879 Delivered

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Name: Nicole Metral  
E-mail: nbmetral@blankrome.com

Message: PSShip eMail Notification

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Our records indicate that the following shipment has been delivered:

Reference: 136044.01923-04319  
Ship date: Nov 17, 2020  
Signed for by: Signature not required  
Delivery location: LAUREL, MS  
Delivered to: Residence  
Delivery date: Wed, 11/18/2020 10:20 am  
Service type: FedEx Priority Overnight®  
Packaging type: FedEx® Envelope  
Number of pieces: 1  
Weight: 0.50 lb.  
Special handling/Services: Deliver Weekday  
Residential Delivery  
Standard transit: 11/18/2020 by 12:00 pm  
  
Tracking number: 399060635879

| Shipper Information    | Recipient Information |
|------------------------|-----------------------|
| Nicole Metral          | Sandra Goulette       |
| Blank Rome LLP         | 3007 CRESCENT HILL DR |
| 2029 Century Park East | LAUREL                |
| 6th Floor              | MS                    |
| Los Angeles            | US                    |
| CA                     | 39440                 |
| US                     |                       |
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## BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

**Phone:** (424) 239-3483

**Fax:** (424) 239-3845

**Email:** nbmetral@blankrome.com

December 3, 2020

### VIA FEDEX

Sandra Goulette  
3007 Crescent Hill Drive  
Laurel, MS 39440  
Federal Express Tracking No. 3998 0475 7135

Re: *PennyMac Loan Services, LLC v. Sitcomm Arbitration Association, et al.*  
Case No. 2:19-cv-00193-KS-MTP (Southern District of Mississippi)

Dear Ms. Goulette:

As you know, plaintiff PennyMac Loan Services, LLC has noticed your deposition for Monday, December 7, 2020 at 11:00 a.m. Central Time. You have not contacted my office to receive the credentials to access the remote deposition. We also understand that you have not contacted Veritext.


Please find the link to access your deposition here:

<https://veritext.zoom.us/j/96475078502?pwd=cjlUNjd0ZTFaQkpVZGJxd3I2RjNQUT09>

Meeting ID: 96475078502  
Password: 0382605763

Should you have any questions, please feel free to contact the undersigned.

Sincerely,



Nicole B. Metral

NBM/tm

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**From:** TrackingUpdates@fedex.com  
**Sent:** Friday, December 4, 2020 12:04 PM  
**To:** Metral, Nicole  
**Subject:** FedEx Shipment 399804757135 Delivered

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This tracking update has been requested by:

Company Name: Blank Rome LLP  
 Name: Nicole Metral  
 E-mail: nbmetral@blankrome.com

Message: PSShip eMail Notification

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Our records indicate that the following shipment has been delivered:

Reference: 136044.01923-04319  
 Ship date: Dec 3, 2020  
 Signed for by: Signature Release on file  
 Delivery location: LAUREL, MS  
 Delivered to: Residence  
 Delivery date: Fri, 12/4/2020 11:03 am  
 Service type: FedEx Priority Overnight®  
 Packaging type: FedEx® Envelope  
 Number of pieces: 1  
 Weight: 0.50 lb.  
 Special handling/Services: Deliver Weekday  
 No Signature Required  
 Residential Delivery  
 Standard transit: 12/4/2020 by 12:00 pm  
 Tracking number: 399804757135

| Shipper Information    | Recipient Information |
|------------------------|-----------------------|
| Nicole Metral          | Sandra Goulette       |
| Blank Rome LLP         | 3007 CRESCENT HILL DR |
| 2029 Century Park East | LAUREL                |
| 6th Floor              | MS                    |
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| US                     |                       |
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Thank you for your business.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

## Eastern Division

PENNYMAC LOAN SERVICES, LLC,

CIVIL ACTION

**Case No: 2:19-cv-00193-KS-MTP**

Plaintiff,

-VS-

SITCOMM ARBITRATION  
ASSOCIATION, MARK MOFFETT,  
SANDRA GOULETTE, RONNIE  
KAHAPEA, MARK JOHNSON, KIRK  
GIBBS, and ALARIC SCOTT,

Defendants.

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S AMENDED NOTICE  
OF DEPOSITION OF DEFENDANT SANDRA GOULETTE PURSUANT  
TO FED. R. CIV. P. 26 AND 30**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

DEPONENT: SANDRA GOULETTE

DATE: December 8, 2020

TIME: 12:30 p.m. Central Standard Time

LOCATION: Remote by videoconference. See Exhibit A. The link for the deposition is below:

<https://proceedings.veritext.com/?token=88aa739ff44be349d5c593427d105d5b>

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, plaintiff PennyMac Loan Services, LLC (“PennyMac”) will take the deposition by oral examination of defendant Sandra Goulette (“Deponent”) on December 8, 2020 at 12:30 p.m. Central Standard Time via remote video conference pursuant to Exhibit A.

The remote deposition will be coordinated by Veritext Legal Solutions, with a business address of 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017. The link for the deposition is

<https://proceedings.veritext.com/?token=88aa739ff44be349d5c593427d105d5b>.

Contact Veritext’s calendar team at [calendar-LA@Veritext.com](mailto:calendar-LA@Veritext.com) if you need additional information or for any technical assistance you may require to assist with carrying out the virtual deposition. We encourage you to access [www.veritext.com/remote](http://www.veritext.com/remote) for additional remote deposition information.

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Dated: December 7, 2020

Respectfully submitted,

/s/ Nicole Bartz Metral

Cheryl S. Chang (admitted *pro hac vice*)

Nicole Bartz Metral (admitted *pro hac vice*)

Jessica A. McElroy (admitted *pro hac vice*)

BLANK ROME LLP

2029 Century Park East, 6th Floor

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Harris F. Powers III

Steven C. Cookston

Upshaw, Williams, Biggers & Beckham,  
LLP

309 Fulton Street  
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Telephone No.: 662-455-1613  
Fax No. 662-453-9245  
hpowers@upshawwilliams.com  
scookston@upshawwilliams.com

*Counsel for Plaintiff*

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1. Physical Presence Prohibited. The witness will be made available for deposition by video, with no attendees physically in the presence of the deponent. Witnesses may not use any communication devices other than those to facilitate the deposition during questioning and may not consult in any fashion with anyone other than with representing counsel during questioning. Witnesses may not privately confer with counsel at all during questioning except as to questions of privilege.

2. Participant List. At least three calendar days prior to the noticed deposition date, each individual planning to participate in the deposition must notify the party noticing the deposition of his/her intent to participate and provide the following information to the noticing party: (a) name, (b) email address, (c) phone number. The noticing party will share this information with the vendor arranging the deposition for the limited purpose of facilitating each participating party's access to the video web portal for the deposition.

3. Technology Requirements. All video depositions will be stenographically recorded by a court reporter with real-time feed capabilities. Each individual participating in a deposition conducted by video must have a webcam-equipped device (such as a desktop, laptop, or tablet), and a device with audio-capabilities or access to a telephone for calling into the deposition. Other than this equipment, the witness shall not be permitted to have access to any other devices (such as a cellphone) while on the record.

Noticing counsel are not responsible for the quality or functionality of the video and audio stream for the witness, observers, or other participants. Attendees agree to work in good faith to facilitate remote participation.

4. Identification of Individuals in Attendance. Each witness, attorney, and other person attending the deposition shall be identified on the record at the commencement of the deposition. Under no circumstances may a person attend the deposition remotely in any manner without identifying themselves on the record at the commencement of the deposition.

5. Conduct by Participants Appearing Remotely. Each individual participating in the deposition (including counsel for the deponent) must do so remotely and must have an active video stream and audio line for the duration of the deposition. Each participant should attend from a quiet, private location.



6. Deponent Communication During a Video Deposition. During the deposition, Deponent shall not communicate with anyone at all outside of the video/audio stream. This includes, but is not limited to, instant messaging, text messaging, or any equivalent. In the event any such communications occur, the parties agree that the communications are discoverable.

7. Disruptions. In the event a participant's video feed is interrupted or otherwise becomes hidden from view, the deposition will be suspended, and the parties will go back on the record only when the participant's video stream functionality has been restored. Disruptions due to video streaming, phone line interruptions, or other technical problems shall not be counted against record time. If a party believes that the transmission and/or recording was disrupted in bad faith, including but not limited to for purposes of delay, it may request that an additional videographer record other participants and may seek further appropriate relief from the Court.

8. Court Reporter and Videographer. The parties will stipulate, in accordance with Federal Rule of Civil Procedure 30(b)(5), that the court reporter or videographer may participate in the deposition by remote means, and that the deposition will be deemed to have been conducted "before" that officer, even though the officer is not physically present with the deponent, so long as that officer is able to identify the deponent.

9. Official Record. The court reporter's transcript, and the videographer's recording (if any), shall constitute the official record of the deposition for all purposes.

10. Other Recording. No participant other than the court reporter and videographer (if any) may record or photograph any of the proceedings. This shall include recording using any form of remote transmitting device, computer recording device, laptops, camera, and personal device, including smart phones, tablets, iPads, Androids, iPhones, Blackberries, or other PDAs. Nothing in this provision prevents or limits the taking of notes by those identified on the record.

11. Use of Remote Depositions at Trial. Remote depositions conducted in accordance with this Protocol may be admitted at trial with the same effect as a deposition conducted in person.

12. Instant Visual Display Technology. In the event the noticing party utilizes instant visual display technology such that the court reporter's writing of

the proceeding will be displayed in real-time, the witness shall not have access to the instant visual display.

13. Applicable Authority. Unless otherwise set forth herein, the Federal Rules of Civil Procedure, Federal Rules of Evidence, and other applicable authority shall govern as though the deposition was conducted in-person.

14. Duration. Nothing herein prevents a noticing party from conducting an in-person deposition once COVID-19 related preventative measures are lifted in the states where the parties and counsel reside. If, however, a noticing party elects to conduct a deposition by remote means even after such measures are lifted, the terms of this Protocol shall continue to govern.

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is **BLANK ROME LLP**, 2029 Century Park East, 6<sup>th</sup> Floor, Los Angeles, California 90067.

On **December 7, 2020**, I served the foregoing document(s):

**PLAINTIFF PENNYMAC LOAN SERVICES, LLC'S AMENDED NOTICE  
OF DEPOSITION OF DEFENDANT SANDRA GOULETTE PURSUANT  
TO FED. R. CIV. P. 26 AND 30**

**on the interested parties in this action addressed and sent as follows:**

**SEE ATTACHED SERVICE LIST**

- ☒ **BY ENVELOPE:** by placing ☐ the original ☒ a true copy thereof enclosed in sealed envelope(s) addressed as indicated and delivering such envelope(s):
- ☒ **BY CERTIFIED MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office or home of the addressee(s) as indicated. I am "readily familiar" with this firm's practice of collection and processing documents for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☒ **BY FEDEX:** I caused such envelope(s) to be deposited in a box or other facility regularly maintained by FedEx, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents in an envelope designated by the said express service carrier, addressed as indicated, with delivery fees paid or provided for, to be transmitted by FedEx.
- ☒ **FEDERAL:** I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.

Executed on **December 7, 2020** at Los Angeles, California.

/s/Charman S. Bee

Charman S. Bee

**SERVICE LIST**

*Pennymac Loan Services, LLC v. Sitcomm Arbitration Association, et al.*;  
Case No. 2:19-cv-00193-KS-MTP

**VIA CERTIFIED MAIL & EMAIL:**

Ronnie Kahapea Defendant  
P.O. Box 875  
Volcano, HI 96785

Brett “Eeon” Jones Defendant  
c/o California Institution for Men Post  
Box 3100  
Chino, CA 91708

**VIA FEDEX & EMAIL:**

Sandra Goulette Defendant  
3007 Crescent Hill Drive  
Laurel, MS 39440  
Email: sandy@saalimited.com

**VIA FEDEX**

Mark Johnson Defendant  
451 May Lane  
Louisa, VA 23093

Kirk Gibbs Defendant  
4155 Lawrenceville Rd.  
PMB 8119  
Lilburn, GA 30047

Kirk Gibbs Defendant  
525 Arlington Circle NW  
Lenoir, NC 28645

Mark Moffett  
345 Coon Jeffcoat Road  
Soso, MS 39480

Defendant

12/14/2020

RE: Depositions - andreasencsr@gmail.com

**Subject: RE: Depositions****Chang, Cheryl S.** <Chang@blankrome.com>

Tue, Dec 8, 3:05 PM (6 days ago)

to sandy@saalimited.com, Metral, Nicole, Harris Powers, McElroy, Jessica

**You are viewing an attached message.** Gmail can't verify the authenticity of attached messages.

Ms. Goulette,

It is now 3pm PT/5pm CT, and it has been nearly an hour and a half since we took a break. We have not been able to reach you. I've called you twice and left voicemails and Ms. Metral has called and left you a voicemail as well. Since it appears you are not rejoining the deposition today, we will suspend the deposition for now and put on the record that you did not return. And we will coordinate with you to continue the deposition to another date. Please advise soon as possible when you are available this month to start your deposition again.

Thanks,  
Cheryl

Cheryl S. Chang | Blank Rome LLP  
2029 Century Park East | 6th Floor | Los Angeles, CA 90067  
O: 424.239.3472 | F: 424.239.3478 | [chang@blankrome.com](mailto:chang@blankrome.com)

-----Original Message-----

From: Chang, Cheryl S.

Sent: Tuesday, December 8, 2020 2:47 PM

To: 'sandy@saalimited.com' <[sandy@saalimited.com](mailto:sandy@saalimited.com)>Cc: Metral, Nicole <[NBMetral@BlankRome.com](mailto:NBMetral@BlankRome.com)>; 'Harris Powers' <[hpowers@upshawwilliams.com](mailto:hpowers@upshawwilliams.com)>; McElroy, Jessica <[JMcElroy@BlankRome.com](mailto:JMcElroy@BlankRome.com)>

Subject: RE: Depositions

Importance: High

Ms. Goulette,

It's been over an hour since we went on break. Can you let us know if you are ok and are able to come back to the Zoom deposition? We were scheduled to reconvene at 2pm PT/4pm CT.

I've left two voicemails on your cell but have not been able to reach you.

Thanks,  
Cheryl

Cheryl S. Chang | Blank Rome LLP  
2029 Century Park East | 6th Floor | Los Angeles, CA 90067  
O: 424.239.3472 | F: 424.239.3478 | [chang@blankrome.com](mailto:chang@blankrome.com) -----Original Message-----

From: Chang, Cheryl S.

Sent: Tuesday, December 8, 2020 2:18 PM

To: 'sandy@saalimited.com' <[sandy@saalimited.com](mailto:sandy@saalimited.com)>Cc: Metral, Nicole <[NBMetral@BlankRome.com](mailto:NBMetral@BlankRome.com)>; Harris Powers <[hpowers@upshawwilliams.com](mailto:hpowers@upshawwilliams.com)>; McElroy,

I've left two voicemails on your cell but have not been able to reach you.

Thanks,  
Cheryl

Cheryl S. Chang | Blank Rome LLP

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

O: 424.239.3472 | F: 424.239.3478 | [chang@blankrome.com](mailto:chang@blankrome.com) -----Original Message-----

From: Chang, Cheryl S.

Sent: Tuesday, December 8, 2020 2:18 PM

To: '[sandy@saalimited.com](mailto:sandy@saalimited.com)' <[sandy@saalimited.com](mailto:sandy@saalimited.com)>

Cc: Metral, Nicole <[NBMetral@BlankRome.com](mailto:NBMetral@BlankRome.com)>; Harris Powers <[hpowers@upshawwilliams.com](mailto:hpowers@upshawwilliams.com)>; McElroy,

Jessica <[JMcElroy@BlankRome.com](mailto:JMcElroy@BlankRome.com)>

Subject: RE: Depositions

Ms. Goulette,

Mr. Powers, the court reporter, the videographer and I are all ready and waiting for you to begin the deposition again. Please join us on Zoom as soon as you can.

Thank you,  
Cheryl

Cheryl S. Chang | Blank Rome LLP

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

O: 424.239.3472 | F: 424.239.3478 | [chang@blankrome.com](mailto:chang@blankrome.com)

-----Original Message-----

From: [sandy@saalimited.com](mailto:sandy@saalimited.com) <[sandy@saalimited.com](mailto:sandy@saalimited.com)>

Sent: Tuesday, December 8, 2020 8:37 AM

To: Metral, Nicole <[NBMetral@BlankRome.com](mailto:NBMetral@BlankRome.com)>

Subject: Re: Depositions

Dear Ms Metral:

I will be in attendance today for the deposition and I agree to accept electronic service to amend the new time and date of the proceeding. I will go to the [veritext.com](https://www.veritext.com) site now and log in to make the arrangements.

In regard to your second questions, I do not have an email address for Mr. Moffett outside of his SAA email and I has not utilized that for the past year to the best of my knowledge. Therefore, I do apologize but I do not speak to him and I do not have any access as to how to reach him via email. Looking in my cell phone, I do have a number for him, however; I am not aware if it is still functional as I have not made any attempts to contact him. I will be more than happy to give that to you if you think that it may help. The number for Mr. Moffett is 601-580-1733

I do apologize that I am not able to supply you with more information, however; I do hope this will help you.

Talk Soon

Sandra Goulette